EXHIBIT "C"

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IN THE UNITED STATES DISTRICT COURT
COURT FOR THE SOUTHERN
DISTRICT OF TEXAS HOUSTON DIVISION

VIRGINIA ELIZONDO, Plaintiff,

V.

Civil Action No. 4:21-CV-01997

SPRING BRANCH
INDEPENDENT SCHOOL
DISTRICT, ET AL.,
Defendants.

ORAL DEPOSITION OF CHRISTINE PORTER DECEMBER 28, 2021

ORAL DEPOSITION of CHRISTINE PORTER, produced as a witness at the instance of the Defendants, and duly sworn, was taken in the above-styled and numbered cause on December 28, 2021, from 9:34 a.m. to 11:45 a.m., before Mendy A. Schneider, CSR, RPR, in and for the State of Texas, recorded by machine shorthand, at the offices of Spring Branch ISD Athletic Center, 1050 Dairy Ashford, Houston, Texas, pursuant to the Texas Rules of Civil Procedure and the provisions stated on the record or attached hereto; that the deposition shall be read and signed before any notary public.

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1 CHRISTINE PORTER, 2 having been first duly sworn, testified as follows: 3 EXAMINATION 4 BY MR. ABRAMS: 5 0. Good morning. 6 Α. Good morning. 7 Q. Would you please state your name? 8 Christine Porter. Α. 9 Ms. Porter, my name is Barry Abrams. Q. 10 lawyer representing Virginia Elizondo in a lawsuit 11 against the Spring Branch Independent School District and its board members in their official capacities. 12 13 Do you understand that? 14 Α. Yes. 15 What do you do for a living? 0. 16 Α. I am the chief financial officer for Spring 17 Branch ISD currently. I've actually been in school 18 finance in a few different school districts for the 19 past 30 years. 20 And at Spring Branch, what does that entail? 21 It entails primarily handling all financial Α. 22 aspects of the district, the collection, the expending 23 of all dollars. 2.4 And in that role, I oversee finance, tax 25 office, purchasing, child nutrition, and federal

I also have the role of being the election 1 2 official for the district. 3 Do you understand that we're here today for ο. 4 you to provide sworn testimony that can be used in the 5 lawsuit? 6 The number is 4:21-CV-01997. It's 7 titled Virginia Elizondo versus spring Branch 8 Independent School District and it's pending in the 9 United States District Court for the Southern District 10 of Texas Houston Division. 11 Do you understand that's why we're here? 12 Yes, I do. Α. 13 If I refer to that proceeding as "the 0. 14 lawsuit," will you know what I'm talking about? 15 Α. Yes. 16 0. What's your understanding about the basis for 17 the lawsuit? 18 My understanding is that there is a feeling Α. 19 by Virginia but I believe representing a group of 20 people who feel underrepresented specifically on the 21 board of trustees and within the dealings of the 22 school district. 23 Do you understand that the lawsuit is being 0.

brought under what's called the Federal Voting Rights

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Act?

1 Α. Yes. 2 Do you understand that the lawsuit contests Q. 3 whether the district's system of electing its trustees 4 at large improperly dilutes the voting strength of 5 certain minorities in the district? 6 That the lawsuit --Α. 7 Q. That claims that. 8 Yes. Uh-huh. Α. 9 Let me hand you what's been marked as Exhibit Q. 10 This is a copy of the deposition notice that 11 was originally issued for this to take place on 12 December the 20th. We, by agreement with the 13 district's lawyer, reset it for today. 14 (Marked Porter Exhibit No. 1.) 15 0. (BY MR. ABRAMS) Have you ever seen the 16 notice? 17 Α. Yes. 18 Do you understand that you're appearing today Q. 19 as one of the representatives for the district that's 20 been designated to testify on the district's behalf 21 with regard to certain topics that are listed in the 22 notice? 23 Yes, I do. Α.

Q. Who made the decision that you would appear as a representative for the district?

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- A. I think -- I believe through conversations with the superintendent, our general counsel felt that I would be the one that could best answer certain of these questions.
- Q. And who authorized you to appear today in the capacity as a representative for the district?
 - A. The superintendent.

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- Q. Who decided what topics you would be designated to testify about on behalf of the district?
- A. That was through discussion with our general counsel.
- Q. What preparation have you made to appear today as the corporate representative on the district's behalf with respect to certain of the topics that are listed in the notice?
- A. I read through the various topics and tried to ensure that I understood what they meant, what was being asked for, and then if I had certain documents that I could review to make sure that -- or background knowledge just to make sure I could have those facts ready to talk about today.
- Q. Have you brought any documents with you here today to assist you in testifying?
 - A. No, I did not bring any documents.
 - Q. Who did you speak with to prepare for your

deposition?

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- A. Our general counsel.
- Q. And beyond what you've described, have you done anything else to prepare?
 - A. No.
- Q. What documents did you review in preparation for your deposition?
- A. I reviewed legal -- our Spring Branch ISD's legal policy. I reviewed the election results for the last 10 years. I reviewed information concerning early election sites as well as number of voters and things that happen at them.

I reviewed the presentation that was provided -- that was given by Thompson Horton back in 2020. I didn't actually attend it, but I did review the presentation as it's a public document.

I also just made sure I was understanding what's happening with our current election calendar to ensure that people were aware for of the critical dates tied to this current year.

I also looked at financial information because one of the topics is covering -- is asking about some per student costs. So I reviewed that.

Q. You mentioned a 2020 presentation by Thompson & Horton.

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Just for our record, Thompson & Horton is a law firm that has, for a number of years, represented the district, correct? Α. Correct. And in 2020, they made a presentation to the 0. board about what that's relevant here? They talked about the different types of electoral systems that are legal in the state of Texas for school districts and how if -- if the board of trustees were considering making any changes, what they would need to do in order to make those changes. Q. You also mentioned that you refreshed your recollection about the critical dates for the 2022 board elections. What are the critical dates for the 2022 board elections as you've defined the term "critical dates"? Well, December 20 of 2021 was critical Α. because I had to post on our Web site information about the upcoming election. January 3 is when our office reopens and people can pick up applications for -- to apply -- to complete in order to run for the election. They can start turning in those

applications on January 19 and they have until

1 5:00 p.m. on February 18 in order to turn in those. 2 Within that next week -- I don't have 3 the exact date for that off the top of my head --4 they'll do the drawing for the order for the ballot 5 and as well as we have to get information -- we have 6 to tell the State that we are hosting an election. 7 So within about a week of that, we have 8 to let the State know that we're hosting the election. 9 Early elections start the last full week 10 in April with our election date being on April 7 --11 excuse me -- May 7. Sorry. 12 Q. Thank you. 13 Who have you met with, other than 14 lawyers for the district, to prepare? 15 I have -- I talked with the previous CFO just 16 to make sure I knew where files were like for the 17 previous election results. 18 Q. Who was that person? 19 Α. That person is Karen Wilson. 20 I also talked -- we have a technology --21 a person in technology who helps run the actual 22 equipment and so making sure, you know, my 23 understanding of what equipment is needed and that 2.4 type of thing, mainly in preparation for this next 25 election and then in response to some changes we're

going to make specifically on early election sites.

Q. What changes are anticipated on early election sites?

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A. We're adding an additional site up in the northwest quadrant of the school district.

Previously, we actually had relatively low in comparison to the entire election numbers of people voting in the early election.

This last year, we actually had over 5,000 voters in the early election and feel that another site is warranted to allow for that type of count as well as ensuring that some of the -- some concerns have been raised about whether or not we were ensuring that everybody could get to all of the locations easily enough. And so we have a site now that's on Gessner so it would allow for easy public access.

Q. We'll touch on the early election sites that the district historically has used a little later.

But is it fair to say that none of those sites were located north of the northeast corner of Hilshire Village?

- A. Yes, that's correct.
- Q. So none of the sites were located in the election precinct that corresponds to the Northbrook

1 election precinct, correct? 2 Α. Correct. 3 None of the sites were located within the 0. 4 precinct that corresponds to the Landrum precinct, 5 correct? 6 Α. Correct. 7 Q. None of the sites were located in the 8 precinct that corresponds to the Spring Woods election 9 precinct? 10 Α. I'm not for sure on their boundaries, but I 11 don't believe that's true. 12 Q. You don't believe it's true or you do believe 13 it's true? 14 I mean, I believe that's -- I believe it's a Α. 15 true statement that it is not in the Spring Woods High 16 School. I just don't know how far Spring Woods High 17 School... 18 Okay. And is the same thing true with Q. 19 respect to the Spring Oaks election precinct, that 20 there were no early voting sites located within the 21 Spring Oaks election precinct? 22 Α. Correct. 23 The only sites historically that Spring 0. 2.4 Branch ISD has had for early voting in the recent past 25

and going back as far as I could see were located

1 within the Memorial Spring Branch and Spring Forest 2 election precincts, correct? 3 Α. That's correct. 4 0. Which of the lawyers for the district have 5 you met with in connection with preparation? I've met with -- oh, in preparation for the 6 Α. 7 deposition? 8 Yes, ma'am. 0. 9 Α. Charles and Lucas and Audrey. 10 When did you meet with them? 0. 11 Yesterday as well as we had a conference call Α. 12 last week. And I met with Audrey in a -- probably a 13 few different times, I mean, you know, in the week 14 leading up to Christmas break. 15 0. All told, how much time have you devoted to 16 preparing to testify about the topics listed that 17 correspond to your testimony in the case? 18 I would say about 20 hours. Α. 19 To make this go as easily as possible, I Q. 20 would like to have several agreements with you. 21 it's important that you understand the proceedings. 22 The lady who is seated to your left is 23 called a court reporter. She is typing down word for

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a transcript and that testimony can be used in the lawsuit.

Do you understand that?

A. Yes.

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Q. You've been doing a great job thus far, but it's important that you continue to answer out loud rather than relying on gestures such as nods of the head or sounds like uh-huh or huh-uh, because those are not things that can be easily taken down by the court reporter.

So will you continue to testify using words and out loud?

- A. Yes.
- Q. As our court reporter mentioned before we went on the record, it's very important that you and I try to not talk over each other, that is, that we speak one at a time, because it's very difficult for the court reporter to untangle people talking over each other.

I promise you I will try very hard not to cut you off when you're answering a question. If I do inadvertently, you just tell me and I'll stop.

By the same token, I sometimes take a while to get a question out. So even if you think you know where I'm going, if you'll give me the courtesy

1 of letting me finish my question before you start an 2 answer, our record will be more complete and our court 3 reporter will be much happier with us. 4 Can you do that? 5 Α. Yes. 6 Q. It's also very important that you understand 7 the questions that you're asked today because the 8 parties have a right to rely upon your testimony. 9 And so I want you to tell me if I ask 10 you a question that I -- that you do not understand. 11 And I will promise you I will try to rephrase it in a 12 way that you do understand it. 13 So will you tell me if you think you 14 don't understand a question? 15 Α. Yes, I will. 16 Q. And may I fairly assume when you've answered 17 my questions that you understood them at the time? 18 Α. Yes. 19 We'll probably break at least once an hour. 20 But in any event, if you need a make at some other 21 time, if you'll simply let me know, I'll be happy to 22 accommodate you. Okay? 23 Α. Okay. 2.4 We've already talked about the fact I'm going Q.

to use the shorthand expression "lawsuit" to refer to

1 the legal proceeding. 2 I don't know that we'll refer very often 3 to the plaintiff, Virginia Elizondo. But if so, if I 4 refer to "the plaintiff" or "Ms. Elizondo," will you 5 know who I'm talking about? 6 Uh-huh. Yes. Α. 7 I will variously refer to the Spring Branch Q. 8 Independent School District as "the district" or 9 "SBISD," and we'll know what we we're talking about, 10 your employer? 11 Yes. Yes. Α. 12 Similarly, from time to time there will be 13 questions about the Spring Branch Independent School 14 District board of trustees. I'll probably shorthand 15 that to refer to simply "the board." 16 If I refer to "the board," will you know 17 that I'm talking about the board of trustees? 18 Α. Yes. 19 I'm going to spend a moment or two just on 20 your personal background. 21 Where do you reside? 22 I reside at -- in Spring Branch ISD at 1507 Α. 23 Shady Villa Manor, Houston, Texas 77055. 2.4 Q. How long have you been a district resident? 25 Α. Five months.

1	Q. Where did you live before that?
2	A. I lived up in Spring for 21 years.
3	Q. Where were you born and raised?
4	A. I'm a military brat. I was born in
5	California. My dad was stationed out there. Mainly
6	grew up, though, on the East Coast in Virginia, North
7	Carolina, and South Carolina.
8	Graduated high school in 1986, and then
9	we all moved to Texas. Dad retired and went to SMU
LO	and became got his master's of divinity and became
L1	a Methodist minister in the Central Conference.
L2	So we're all in Texas now, but I would
L3	say pretty much I grew up on the East Coast.
L4	Q. You mentioned that you graduated from high
L4 L5	Q. You mentioned that you graduated from high school in 1986.
L5	school in 1986.
L5 L6	school in 1986. What high school was that?
L5 L6 L7	school in 1986. What high school was that? A. Buford Academy in Buford, South Carolina.
L5 L6 L7 L8	school in 1986. What high school was that? A. Buford Academy in Buford, South Carolina. Q. After high school, did you then go on to
L5 L6 L7 L8	school in 1986. What high school was that? A. Buford Academy in Buford, South Carolina. Q. After high school, did you then go on to college?
L5 L6 L7 L8	school in 1986. What high school was that? A. Buford Academy in Buford, South Carolina. Q. After high school, did you then go on to college? A. I did. I went to Texas A&M University in
15 16 17 18 19	school in 1986. What high school was that? A. Buford Academy in Buford, South Carolina. Q. After high school, did you then go on to college? A. I did. I went to Texas A&M University in College Station, Texas. Graduated in 1990 with a
15 16 17 18 19 20 21	school in 1986. What high school was that? A. Buford Academy in Buford, South Carolina. Q. After high school, did you then go on to college? A. I did. I went to Texas A&M University in College Station, Texas. Graduated in 1990 with a degree in accounting.
15 16 17 18 19 20 21 22	what high school was that? A. Buford Academy in Buford, South Carolina. Q. After high school, did you then go on to college? A. I did. I went to Texas A&M University in College Station, Texas. Graduated in 1990 with a degree in accounting. Q. Could you give me a horseback view of your

at First Bank of Texas. After doing that for about a 1 2 year and a half. As they got taken over by the Feds 3 by the second time, I realized it was probably time to 4 move on. 5 I actually responded to -- you know, 6 back then, you can used to look at newspaper articles, 7 you know, the classifieds and circled. 8 So I responded to a job application at 9 955 Campbell Road, not really knowing what I was 10 applying for. 11 And it was Spring Branch ISD. So I 12 started here -- I'll call myself a baby accountant. 13 And I was here for 5 years. 14 When I left, I was the budget manager. 15 I went to Tomball ISD. Was the business manager there 16 for 3 years. 17 And then went to Spring ISD. Started 18 off as the controller. And when I left there, I was 19 the CFO. And then came back to Spring Branch. After 20 a little break came back to Spring Branch and was the 21 payroll manager, the tax assessor, and then the CFO a 22 year and a half ago. 23 Did any of the school districts you worked 0. 2.4 for, before you came back to Spring Branch, elect any 25 of their trustees from single-member districts?

1 Α. No. 2 Do you have any personal experience working Q. 3 for school districts where trustees have been elected 4 from single-member districts? 5 Α. No, I do not. 6 Q. Have you ever personally been a party to a 7 lawsuit, that is, sued somebody or been sued? 8 Α. No. 9 Q. You understand you're not a party to this lawsuit? 10 11 Α. Yeah, I do. 12 You're here merely as a witness and you're Q. 13 here merely as a witness on behalf of the district. 14 Α. I do. 15 Q. Okay. 16 Α. T do. 17 0. Have you ever been through this process of 18 being deposed before? 19 Α. No. 20 Have you ever gone through the process of 0. 21 testifying in some other setting before? 22 Α. Yes. 23 If you would, tell me about that prior 2.4 testifying experience. 25 It was a -- a friend of mine had been accused Α.

1 of an improper relationship with a student, and so I 2 was a character witness on his behalf. 3 Are there any other occasions where you have 0. 4 testified other than that one instance? 5 Α. No. 6 Q. Do you have any professional licenses or 7 certifications? 8 I do. I have a certified public accountancy Α. 9 certificate. 10 From the State of Texas? 0. 11 From the State of Texas, yes. Α. 12 And when -- when did you obtain your Q. 13 certification? 14 1992 or '3. Α. 15 Have you ever been charged and convicted of 0. 16 any criminal offense? 17 Α. No. 18 Are you familiar with Ms. Elizondo? Q. 19 Α. Yes. 20 0. How? 21 She led a committee that I was a part of Α. 22 during the -- let me get my years straight -- the 23 '20-'21 year, the visioning committee that focused on 2.4 what a Spring Branch ISD graduate would look like, and 25 not just an official graduate but as they move between

1 elementary to middle and middle to high school. 2 I also -- she also ran for the school 3 board in 2021. 4 0. Are you familiar with her educational 5 background? 6 I believe she has lots of educational Α. 7 I remember being familiar and have -- you background. 8 know, seeing that on the application. I believe she 9 has at least a master's, if I'm remembering correctly. 10 0. And if I understood your prior testimony, 11 you're familiar with at least some of her involvement 12 in district activities because she headed a committee 13 that you participated in? 14 Α. Yes. 15 Do you recall the title of the committee or 0. 16 whatever the topic was? 17 I thought it was the visioning committee. Α. 18 Does the district agree that Ms. Elizondo met ο. 19 all the legal requirements to be eligible for election 20 to the district board when she ran? 21 Α. Yes. 22 Let's now turn to some of the issues in the Q. 23 lawsuit for which you've been designated as a 2.4 representative. 25 Has the racial and ethnic composition of

the voters in the district changed over time?
A. Yes.

How has it changed?

- A. I believe, without knowing exact numbers, that the -- we've become a much more diverse school district, and the population of the school district is reflecting -- is reflected in that. The minority groups are larger than they've been, you know, 30 years ago.
- Q. Do you agree that when the district was formed and for a number of years its population was virtually all white?
 - A. Yes.

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- Q. And do you agree that in the -- let me back up and say when I use the term "you," you're here in a representative capacity. So we're going to be talking about the district.
 - A. Right.
- Q. It will be a little less cumbersome if I can still refer to you knowing you're speaking for the district than always saying does the district agree.
 - A. Okay.
 - Q. Are you okay with that convention?
- A. Yes, as long as my response looks like I'm responding on behalf of the district.

1 All right. I mean, I can do it either way. Q. 2 Α. No, it's fine. 3 Do you -- does the district agree that in the 0. 4 past 20 years the racial and ethnic composition of the 5 population in the district has changed significantly? 6 Α. Yes. 7 Q. Does the district agree that what was once a 8 district in which a majority of the voters and 9 students were white is a now a district where the 10 Hispanic population is greater than the white 11 population and the percentage of Hispanic students 12 more than twice the percentage of white students? 13 Α. Yes. 14 Does the district agree that it is now a 0. 15 majority minority district in terms of the total 16 population in student population?

A. I can attest to the student population as yes.

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- Q. With respect to the total population, does the district agree that the total population of the district is now majority minority?
- A. I just haven't seen numbers to that to know that for sure. I haven't seen recent census numbers, but I know we -- we believe that and act in that manner.

1 The district's position is without regard to 0. 2 the specifics, it acknowledges its belief that it is a 3 majority minority district in terms of total 4 population at this point in time? 5 Α. Yes. 6 0. Let me hand you what's been marked as 7 Exhibit 2. This is a screenshot from the district's 8 Web site. 9 (Marked Porter Exhibit No. 2.) 10 Q. (BY MR. ABRAMS) Are you familiar with --11 Α. Yes. 12 -- this page from the district's Web site? Q. 13 Α. (Nodding head.) 14 The district's Web site purports to break 0. 15 down the demographics of its students. And is it the 16 district's position that the little graph on the 17 right-hand side properly describes the racial and 18 ethnic composition of its student body --19 Α. Yes. 20 -- as of 2021? 0. 21 Α. Yes. 22 Exhibit 2 shows that 59 percent of the Q. 23 district's students are Hispanic, 27 percent of its students are white, 7 percent of its students are 24 25 Asian, and 5 percent of its students are

1 African-American, correct? 2 Α. Correct. 3 Exhibit 2 also reflects that 58 percent of 0. 4 the district students are economically disadvantaged. 5 Is that correct? 6 Α. Correct. 7 What does that term mean in the way that the Q. 8 district uses it on its Web site? 9 It means that 58 percent of the students have 10 completed information concerning free and reduced 11 lunch applications and have been found to be -- to be 12 eligible for free or reduced meals through our lunch 13 program. 14 As a general proposition, what is the 0. 15 standard financially that a some -- that a student 16 needs to meet to be eligible for the free and reduced 17 lunch program which qualifies it as an economically 18 disadvantaged student? 19 Α. You mean what's the level of income in the 20 family? 21 0. Yes, ma'am. 22 I don't have that -- I don't know that number Α. 23 off the top of my head. 2.4 Q. I noticed that the infographic, Exhibit 2, 25 says that 59 percent of the students are Hispanic and

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58 percent of the total student body are economically disadvantaged.

Does the district know what the correlation is between the race and ethnicity of the economically disadvantaged students in that status?

- A. That information can be pulled. I don't know that.
- Q. Does the district acknowledge that a greater proportion of its minority students are economically disadvantaged than its white students?
- A. I -- I believe that's a trend that can be deduced from the two graphs.
 - Q. I'm not clear about your answer.

Are you telling me that's something that one could determine or that you think that that is the case based upon the information available to you?

- A. I think based on seeing these percentages, that's a fair assumption, but I would want to verify that data.
- Q. We talked earlier about how the demographics of the district changed over time.

I want to now ask you: Do you -- does the district agree that in the past 20 years the socioeconomic background of the district's residents and students has likewise changed?

Page 27 1 Α. Yes. 2 How has it changed? 0. 3 I believe the percentage used to be less than Α. 4 50 percent and now it is over 50 percent. 5 0. What percentage? The percentage of economically disadvantaged 6 Α. 7 students. 8 What proportion of the students in the 0. 9 district now attend what are called Title I schools? 10 I wish I would know that percentage off the Α. 11 top of my head. I would have to compare two different 12 lists, a list of students by campus and highlight the 13 Title I campuses. 14 What's your best estimate -- what's the 15 district's best estimate realizing that's subject to 16 mathematical verification? 17 I would say at least 50 percent. Α. 18 What is Title I? 0. 19 Α. Title I is the short-term version of monies 20 we receive directly from -- or through -- through the 21 State of Texas, but from the federal government that 22 are based on the number of students at campuses that 23

are considered economically disadvantaged.

And so it's supplemental dollars we receive that gets -- that is provided to campuses to

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1 spend at their discretion to focus on the needs of 2 their campuses. 3 If I'm following you, then, Title I funds are 0. 4 federal funds that are allocated through the State 5 then to the district and then to individual campuses. 6 Is that a correct generalization? 7 Α. It's more of a passthrough --8 Q. Okay. 9 Α. -- of the state. They don't really allocate it. 10 11 federal government determines that a school district 12 gets X amount based on their number of students. 13 Does the district agree that all of the 0. 14 current members of its board are white or -- or 15 Caucasian? 16 Α. Yes. 17 Does the district agree that it has no record 0. 18 that any minority candidate has ever been elected to 19 serve on the Spring Branch Independent School District 20 board? 21 Α. Yes. 22 What investigation or search of district Q. 23 records has been done to confirm that fact? 2.4 Α. I looked at the election results. So I could 25 only base it on surnames, I mean, some recent

surnames, obviously Chris Gonzalez, if you saw that, and didn't know otherwise.

But no other surnames indicated such. While I didn't personally do it, I understand that a review of pictures of the board has been done and based on those review and on the pictures that could be found, nobody of it -- nobody of color has been elected.

- Q. Does the district agree that in every trustee election for the past 10 years the candidate elected was white?
 - A. Yes.

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- Q. And as we confirmed a moment ago, a hundred percent of the current board members are white?
 - A. Yes.
- Q. Does the district agree that no Hispanic or other minority candidate has been elected to the board in the past 10 years even though the percentage of both the minority student and adult populations is greater than the percentage of white population and students in the district?
 - A. Yes.
- Q. Does the district agree that every minority candidate for the board during the period from 2010 to 2021 was defeated by a white candidate?

1 Α. Yes. 2 (Marked Porter Exhibit No. 3.) 3 (BY MR. ABRAMS) Let me hand you what's been 0. 4 marked as Exhibit 3. This is a document the district 5 has produced titled "2010 to 2021 List/Names of All 6 Candidates, correct? 7 Α. Correct. 8 Does the district acknowledge that in 2015 9 Virginia Elizondo was a minority candidate for the 10 board? 11 Α. Yes. 12 And in 2018, Noel Lezama was a minority Q. 13 candidate for the board? 14 Α. Yes. 15 And in 2019, David Lopez was a minority 16 candidate for the board? 17 Α. Yes. 18 And, again, in 2021, Virginia Elizondo was a 19 minority candidate for the board? 20 Α. Yes. 21 And in each of the elections in which they 0. 22 ran, the white candidate defeated the minority 23 candidate, correct? 2.4 Α. Yes. 25 Does the district agree that there is ο.

1 statistically significant evidence of racially or 2 ethnically polarized voting in the district's board 3 elections for the period 2015 to 2021? 4 Α. Can you define "racial polarization"? 5 0. Yes. 6 By the term "racially polarized," I mean 7 that there's a consistent relationship between the 8 race or ethnicity of the voter and the way the voter 9 votes and that white and minority voters vote 10 differently. 11 That is not data we obtain on our voters, so Α. 12 I would expect that an expert might be able to get 13 that data. 14 In the lawsuit, the district filed an answer. 0. 15 Do you understand that's part of the 16 procedure? 17 Α. Yes. 18 And in that answer, the district took the 19 position that as a matter of fact there is no such 20 evidence of racially polarized voting. 21 What investigation had the district 22 conducted before filing an answer in the lawsuit 23 denying that there's racially polarized voting in the

The district itself didn't do any actual

district's board elections for the past 6 years?

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investigation of it. Again, because we don't track, we don't obtain that data of the race or ethnicity of the actual voters, that information would have come through discussion with the experts.

- Q. Before the district filed a document with the federal court denying that there is racially or ethnically polarized voting in its board investigations, what investigation had the district conducted to corroborate that position?
 - A. None.

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- Q. Has the district ever investigated or does it have any knowledge about whether or not racially or ethnically polarized voting exists in the elections of the municipal governments that make up the district?
 - A. We're not aware of any.
- Q. Are you telling me you're not aware of any investigation the district has ever undertaken to determine whether or not the voting in the cities that make up the district, which are Hunters Creek Village, Piney Point Village, Bunker Hill Village, Spring Valley Village, Hilshire Village, and the City of Houston, involve racially polarized voting?
- A. We don't know anything about the data that's been happening in those sites.
 - Q. And the district has not conducted any

investigation to determine whether or not the voting in any of those jurisdictions is racially polarized or ethnically polarized, correct?

A. Correct.

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- Q. Given that the district had not conducted any investigation about whether or not the voting in its trustee elections was racially or ethnically polarized when it denied that fact in the federal lawsuit, what was the basis for making such a denial?
- A. We did not have evidence to the contrary. We had investigated it, but we had no evidence.
- Q. Does the district agree that white non-Hispanics in the district vote sufficiently as a block to enable them to defeat minority voters' preferred candidates of choice in the various trustee elections?
- A. I believe that's something that an expert can look at the data. And the district has never looked at the voting population by race to be able to make that deduction ourselves.
- Q. So does the district agree that when it filed a document in the federal lawsuit denying that white non-Hispanics in the district vote sufficiently as a block to enable them to defeat minority voters' preferred candidates, it had no evidence to support

that denial?

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- A. Or evidence against that denial, but correct.
- Q. And before making that denial in the federal lawsuit, the district did not undertake an investigation to determine whether or not the statement was true, correct?
 - A. Correct.
- Q. Does the district agree that the geographic concentration of Hispanics in the district is large enough to constitute a majority of the voting age population in one or more single-member districts if there was a seven-member election plan adopted or ordered by the court?
- A. It's our understanding that that can happen, that -- that they can make those single-member districts.
- Q. What is the district's position about the number of single-membered districts that could be formed in which the geographic concentration of Hispanics would constitute a majority of the voting age population?
- A. I've heard that three, up to three could be established.
- Q. Who has provided the factual information to the district that as many as three single-membered

districts could be drawn in which a majority of the voting age population would be Hispanic?

- A. That was based on some meetings we had with legal counsel at the time.
- Q. Does the district possess any written investigation or report confirming that the geographic concentration of Hispanics in the district is sufficient to constitute a majority of the voting age population in as many as three single-membered districts if a seven-member plan were adopted?
- A. We don't maintain documents. Those were mainly talked about during discussions with our legal counsel.
- Q. Setting aside communications with legal counsel, which I presume and understand the district will assert privilege over, are you aware of any other sources of information confirming that as many as three single-membered districts could be drawn in Spring Branch in which the concentration of voting age Hispanics would be a majority?
 - A. No.

- Q. Does the district agree that single-member district forms of representation can enhance the proportional representation of minority candidates?
 - A. The district understands that it is within --

it is legal within the electoral system to use that and it does provide an opportunity for participation in some areas of the district that have lower participation.

- Q. Isn't the district's position that adoption of a single-member district form of representation can result in enhanced representation of the minority community on its board?
- A. The board believes they represent the entire district already, so it would be more a focus on ensuring that they have participation from the areas of those school districts, the area of the school district.
- MR. ABRAMS: Object to the answer as nonresponsive.
- Q. (BY MR. ABRAMS) My question is whether or not the district has a position on whether single member district forms of representation can have the effect of enhancing the representation of minority candidates on the district's board?

MR. CRAWFORD: Objection; form.

- A. I have not heard the board discuss anything like that.
- Q. (BY MR. ABRAMS) So as we sit here today, is it fair to say the district has no position on whether

single-membered district forms of representation can, in fact, enhance proportional representation of minority candidates on the board?

MR. CRAWFORD: Objection; form.

- A. They stand that they represent the entire district as it is. I know that's not answering your question.
- Q. (BY MR. ABRAMS) Has the district investigated whether or not single-membered district forms of representation can enhance proportional representation of minority individuals on the board?
- A. To the extent that that is a legal way to hold your electoral system, that investigation -- or requests for information from legal counsel has happened, which led to that presentation in January of 2020.
- Q. In connection with the lawsuit and the district's answer that it filed in the lawsuit and prior to filing that answer, had the district investigated whether adopting a single member form of representation could enhance the representation of minority residents on the board?
 - A. I'm not aware of any.
- Q. Does the district agree that single-membered district representation can increase the likelihood

1 that minority candidates will run for office on the 2 board? 3 Α. It can increase the likelihood that they will 4 run for the board. 5 0. Does the district agree that the single-member district representation can produce 6 7 policies that are more responsive to the preferences 8 of minority voters than at-large systems do? 9 MR. CRAWFORD: Objection; form. 10 Α. I know the board feels that they represent 11 the entire district. 12 MR. ABRAMS: Objection to the answer as 13 nonresponsive. 14 (BY MR. ABRAMS) My question does not concern 15 the district's current plan. My question concerns 16 whether the district has a position on the issue of 17 single-member representation producing policies that 18 are even more responsive to the preferences of 19 minority voters than is the case under the current 20 at-large system. 21 Does the district have a position on that? 22 MR. CRAWFORD: Objection; form. 23 No, we don't have a position on that. Α. 24 Q. (BY MR. ABRAMS) Does the district agree that 25 the racial and ethnic demographics in the so-called

1 Memorial Villages are substantially different than the 2 racial and ethnic composition of the areas outside the 3 villages located north of Interstate Highway 10? 4 Α. Yes. 5 I'm going to probably refer to Interstate Q. 6 Highway 10 as "I-10" or the "Katy Freeway." 7 If I use those expressions, will you 8 know what I'm talking about? 9 Α. Yes. 10 0. Probably I-10 is the more current version. 11 group up in an era where it was the Katy Freeway. But 12 you know -- either use you'll know what I'm talking 13 about? 14 Α. Yes. 15 Q. Okay. 16 (Marked Porter Exhibit No. 4.) 17 0. (BY MR. ABRAMS) Let me hand you what's been 18 marked as Exhibit 4. 19 Do you recognize that as a map depicting the 20 boundaries of what I call the so-called Memorial 21 Villages, which encompasses Bunker Hill Village, Piney 22 Point Village, Hunters Creek Village, Hedwig Village, 23 Spring Valley Village, and Hilshire Village? 24 Α. Yes. 25 And I'm not holding you to the standards of a ο.

1 demographer, but do the boundaries appear to be --2 correspond for what you understand and the district 3 understands the boundaries of those villages are? 4 Α. Yes. 5 Does the district acknowledge that the 0. 6 non-Hispanic white populations in the Memorial 7 Villages range from 94 plus percent to 67 percent of 8 those populations? 9 Α. Can you repeat that question? 10 0. Yes, ma'am. 11 Does the district acknowledge that the 12 non-Hispanic white populations of the Memorial 13 Villages vary from 94 plus percent to 67 percent of 14 the total populations in those communities? 15 Α. Yes. 16 Q. Does the district acknowledge that the 17 villages report very small Hispanic and black 18 populations? 19 Α. Yes. 20 Does the district acknowledge that the racial 21 and ethnic segregation in the villages corresponds to 22 the racial and ethnic segregation evident in the 23 student populations on the north and south sides of 24 the freeway? 25 Objection; form. MR. CRAWFORD:

1 I'm not sure about the word "segregation" and Α. 2 the connotation with that. 3 (BY MR. ABRAMS) Let me -- let me rephrase the Q. 4 question. 5 Does the district acknowledge that the racial 6 and ethnic demographics in the villages correspond to 7 the racial and ethnic demographics evident in the 8 student populations in the district's north and 9 south-side schools? 10 Α. I'm going to try to reword the question. 11 Yes, ma'am. Q. Tell me if I'm correct. 12 Α. 13 Yes, ma'am. 0. 14 You're asking if the racial breakdown of the Α. 15 villages represents the entire school district? 16 Q. No, ma'am. 17 Α. I'm sorry. 18 Let me -- let me take another crack at it. Q. 19 Α. I'm sorry. 20 I think we're in agreement, and the district 0. 21 acknowledges, that the population of the Memorial 22 Villages is largely white and nonminority, correct? 23 Α. Correct. 24 It is also the case, isn't it -- isn't it Q. 25 that the populations of the schools on the south side

of I-10 are largely white and not minority?

A. I believe that to be accurate, but I would

- want to see the data to verify that.
- Q. While the district has maintained its current at-large system for electing school board trustees, has it ever investigated why residential demographics of the Memorial Villages are what they are?
 - A. No.

- Q. Has the district ever investigated how the racial and ethnic demographics came about in the district as evidenced by the demographics of the Memorial Villages?
 - A. No.
- Q. Has the district ever investigated how the racial and ethnic demographics on the north side of I-10 have come about over time?
 - A. No.
- Q. Has the district ever investigated whether the racial and ethnic demographics in the district has negatively affected the delivery of educational services to its students?
 - A. Can -- will you repeat that?
- Q. Sure. Has the district ever investigated whether the racial and ethnic demographics in the district, which I'll oversimplify to mean the

south-side schools are largely white and many, if not all of the north-side schools are largely minority, how that demographic breakdown affects the delivery of educational services to the students?

A. We focus more -- not based on racial. We focus more on economically disadvantaged and the needs of specific students versus just whether or not there's Hispanics in a campus or not.

Economically disadvantaged often brings other opportunities for need for certain services, additional services, and supports. So that would be more the focus on the educational delivery.

Q. If I'm following you, then, the district has had a focus on the impact of socioeconomic factors on the delivery of educational services to its students rather than the impact of the racial and ethnic demographics of the district.

Is that what you're saying?

- A. We've seen the effect of that. When you say "investigation," we haven't -- I don't know the right -- I apologize -- into why that is, we just recognize that the students often need additional services and support when they're lower socioeconomic.
- Q. We're coming up on an hour. Would you like a break or you want to keep trucking? I'm at your

1 disposal. I told you we would break around every hour 2 and it looks like we're close to an hour. So if you 3 would like to take a short break, we can. If you 4 don't, we'll keep trucking. 5 Α. Let's take a short break. That would be 6 great. 7 Very good. Q. 8 Thanks. Α. 9 Uh-huh. Q. 10 (Break from 10:24 a.m. to 10:32 a.m.) 11 Q. (BY MR. ABRAMS) Ms. Porter, the ethnic and 12 racial makeup of the students in the District 7 13 election precincts is heavily segregated, right? 14 Α. Heavily diverse? I just -- I apologize. 15 0. The racial and ethnic composition is 16 concentrated and varies among the districts? 17 Α. Correct. 18 Let me hand you what's been marked as 19 Exhibit 5. That was produced by the district as SBISD 20 No. 1. 21 (Marked Porter Exhibit No. 5.) 22 (BY MR. ABRAMS) Do you recognize that as a Q. 23 map from the district's Web site that depicts both the 24 attendant zones for the middle schools in the district 25 and because those attendant zones are used as the

1 election precincts -- the election precincts for the 2 district? 3 Α. Yes. 4 0. Does the district agree that four of the 5 seven districts shown, namely the Landrum, Northbrook, Spring Woods, and Spring Oaks Middle School areas and 6 7 precincts, are overwhelmingly comprised of Hispanic 8 students? 9 Α. Yes. 10 0. Based on my math, there's an average of 11 87 percent of the students in those election precincts 12 and enrollment districts are Hispanic. 13 Does that figure sound about right? 14 Yes, that sounds about right. Α. 15 In the remaining three election or enrollment 0. 16 districts, the Memorial, Spring Branch, and Spring 17 Forest precincts, the student body is somewhere 18 between 42 percent and 52 percent white, correct? 19 Α. That sounds correct. 20 One of the topics that you've been designated 0. 21 to testify about is the current ethnic and racial 22 background of the citizenship voting age population 23 voters in the district. 24 Do you agree that the ethnic and racial

background of the voting age population of the voters

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in the district more or less tracks the ethnic and racial background of its students?

- A. I have not seen recent -- any recent census numbers, but I would believe that it follows the breakdown of the students.
- Q. And -- and based upon the investigation that's been conducted by the district to date, at least three single-member districts could be drawn in the district in which the Hispanic voting age population would constitute a majority, correct?
 - A. Yes.

- Q. How and when did the district draw the current boundaries of its election precincts, which happen to be at school enrollment districts?
- A. In 2011, I believe that was when the Legislature passed a law stating that we, as a district, host our own elections if we went into a contract with either a county or a city, host our own election in May.

Prior to that, 2011 and prior, we actually had the precincts of our elementary schools. So in -- when the law passed, we had discussions with the county and the county said that they would be willing to partner with us, but would only agree to do elections every other year.

1 And I believe it would be the even years 2 in the sense that when they do their even year 3 elections in November, there's lots of runoffs that 4 happen in the spring that would make it too difficult 5 for them to host our elections separately. 6 So we -- instead we didn't want to -- at 7 the time didn't want to change our setup of our 8 staggered terms of every 3 years because we would have 9 had to switch to every 4 years for -- if we had gone 10 with the county. 11 So we were able to partner with Piney 12 Point, who we currently have a contract with, because 13 they used one of our far east elementary schools as a 14 site for their elections already prior to that. 15 And by taking over the election process 16 ourselves, we had to look at the administration and 17 financial implications of such. 18 And so having seven election sites would 19 be easier to handle both administratively and 20 financially because of the equipment and the people 21 involved than 26 sites of the elementary school. 22 So that was when that decision made 23 for -- and it occurred in the 2012 election the first 24 time. 25

Do you agree that with the exception of the

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Spring Branch Middle School and the Spring Forest
Middle School election precincts and enrollment
boundaries, those areas are divided between schools
located on the north and south sides of I-10?

A. Yes.

- Q. What's the rationale for having election precincts and middle school boundaries that zone voters and students from the north side of I-10 to the south side of I-10 for the Spring Branch and Spring Forest Middle Schools?
- A. Using them for election sites -- I mean, for election precincts?
- Q. Yeah. It's kind of intertwined. The district elected chose to use its middle school enrollment districts --
 - A. Uh-huh.
 - Q. -- as its election districts?
- 18 A. Yes.

- Q. And so I'm not trying to take you into the school enrollment question, but since the district chose to use its middle school enrollment districts as its election precincts, my question is: What's the rationale for having precincts in -- for Spring Branch and Spring Forest that span I-10?
 - A. Those enrollment boundaries were set many

years ago. So I don't know the rationale why there was north and south, but primarily it has to do with ensuring that you -- the schools could handle the number of students.

I've seen in other districts' enrollment boundaries change as a school may increase, not be able to handle their growth.

So it's possible changes could be made. But as we are pretty steady in our growth of students, we haven't had to have any type of change to our middle schools or any of our enrollment zones, for that matter.

- Q. When did the district adopt the middle school enrollment zones that are shown on Exhibit 5?
- A. When the last middle school was built, which would have been -- I believe is Northbrook Middle. So I would say at least the mid-'80s.
- Q. So the boundaries of the election precincts and the boundaries of the middle school enrollment zones have been in place since sometime in the 1980s, correct?
- A. The fact that they're the same, that didn't happen until 2012, but yes.
 - Q. Let me clarify that.

In 2012, the district elect -- chose to

1 use its middle school enrollment zones as its election 2 precincts, correct? 3 Α. Yes. 4 0. And the district's decision to set the 5 boundaries of its middle school enrollment zones dates 6 back to the 1980s? 7 Α. Yes. 8 (Marked Porter Exhibit No. 6.) 9 (BY MR. ABRAMS) Let me hand you what's been Q. 10 marked as Exhibit 6. 11 You recognize this as the enrollment zones 12 from the district's Web site for its high schools? 13 Α. Yes. 14 It follows the same general layout as 0. 15 Exhibit 5 except this map, Exhibit 6, depicts the high 16 school enrollments or attendance zones? 17 Α. Yes. 18 And the same pattern holds true for the high 19 schools as is true for the middle schools, and that is 20 there are two enrollment zones where students on the 21 north side go to the south side, the Memorial and the 22 Stratford enrollment zones, correct? 23 Α. Correct. 24 And that mirrors the pattern for middle Q. 25 schools where students on the north side of I-10 go to

1 Spring Branch Middle and students on the north side of 2 I-10 go to Spring Forest Middle, correct? 3 Α. Yes. 4 0. What is the racial and ethnic composition of 5 the students from the north side of I-10 that are 6 zoned to the south side middle schools and high 7 schools? 8 I don't know that. I would have to dive into Α. 9 street addresses. 10 We earlier looked at Exhibit 4. Would you 0. 11 pull that back out just so you can refer to it when 12 you look at Exhibit 5? 13 Exhibit 4 depicts the boundaries of the 14 Memorial Villages north of I-10. 15 Do you see that? 16 Α. Yes. 17 0. Spring Valley Village and Hilshire Village? 18 Uh-huh. Α. 19 Is that a "yes"? Q. 20 Α. Yes. 21 Q. Thank you. 22 Can you confirm that with reference to 23 Exhibit 5 the areas of Spring Valley Village and 24 Hilshire Village are among the areas zoned from north 25 to south?

Their students go to Spring Branch
Middle rather than to one of the north-side middle
schools?

- A. Let me just verify. Yes. It looks like Spring Valley Village and Hilshire Village all attend Spring Branch Middle.
- Q. And we earlier confirmed that the racial and ethnic composition of Spring Valley Village and Hilshire Village is majority -- substantially majority white, correct?
 - A. Correct.

- Q. From that, does it follow that the students that are sent from the north side from Spring Valley Village and Hilshire Village to the south side middle school, Spring Branch Middle, are substantially white students?
 - A. Yes.
- Q. Do you happen to know anything about the demographics of the area north of I-10 where the Spring Forest Middle School students go from north to south?
 - A. No, I don't.
- Q. Isn't it the case that the demographics of that subdivision likewise are largely white, with white students going from north to south?

1 I don't know that. Α. You're not denying it, you just don't know? 2 Q. 3 Α. I don't know. 4 (Marked Porter Exhibit No. 7.) 5 0. (BY MR. ABRAMS) Let me hand you what's been 6 marked as Exhibit 7. 7 Do you recognize that as the map from the 8 district's Web site akin to Exhibits 5 and 6? 9 one, Exhibit 7, depicts the enrollment zones for the 10 district's elementary schools. 11 Α. Yes. 12 And can you confirm that the same pattern or Q. 13 a similar pattern holds true with respect to the 14 elementary schools that, with the exception of a 15 couple of schools, school enrollment boundaries are 16 divided between schools located on the north and south 17 side of I-10? 18 Α. Yes. 19 What is the racial and ethnic composition of Q. 20 the students zoned from the north side of I-10 to 21 south-side schools? 22 I believe there's more minorities. Α. 23 0. Pardon me? 24 Α. I believe that it's a higher minority in 25 that -- in the schools that are on the north side.

Q. Right.

With respect to Hunters Creek Elementary on the right side of Exhibit 7, if I'm interpreting these colors correctly, it looks like the area between Wirt and not quite up to Antoine is zoned for north to south?

- A. Yes.
- Q. Can you confirm that the racial and ethnic composition of the students zoned from north to south there is largely white?
- A. I don't know that. It is outside of Hilshire Village, however.
- Q. Does the district contend that it is purely coincidental that the vast majority of the voters and students zoned from the north side of I-10 to the south side of I-10 are white students from white households? For example, Spring Branch Middle School Spring Forest Middle School, Memorial High School, Stratford High School, Hunters Creek Elementary, and Thornwood?

MR. CRAWFORD: Objection; form.

- A. Yeah.
- Q. (BY MR. ABRAMS) Is that just a coincidence that the vast majority of the students and voters that are moved from the north side to the south side for

those schools are white? 1 2 Α. Yes. 3 Does the district advance the theory that it 0. 4 is a proponent of neighborhood schools? 5 Α. Yes. Why, if the district advances the theory of 6 Q. 7 neighborhood schools, are students placed in enrollment districts that take them to schools that 8 9 are physically farther from their home than schools 10 nearby their home? 11 Objection; form. MR. CRAWFORD: 12 Α. When an elementary school is built, they 13 consider having students its being built for. And 14 schools aren't built in these perfectly middle of 15 squares and divided out among the school district. 16 And so that very well could be the case, 17 that a person -- that a household could be zoned to a 18 school that's actually further away from a school that 19 could literally be right across the street. 20 (BY MR. ABRAMS) I'm looking at Exhibit 5, the 21 election precinct map which corresponds to the middle 22 school attendance zone map. 23 Do you have that? 24 Α. I do. 25 Has the district ever taken into account the

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racial, ethnic, and socioeconomic characteristics of each of these election precincts and school attendance zones?

- A. In what regard? I mean, taken into account as election zones?
- Q. And/or school enrollment zones, the fact that their school enrollment zones where there are white students on the north side of I-10 that could readily be zoned to a school a stone's throw away but nevertheless they're zoned to a white school south of I-10?
- A. When these boundaries were established, I believe it was based on how many students a school could hold.
- Q. Have the boundaries of any election precinct or school enrollment zone been the subject of discussion with any of the municipalities in the district?
- A. Not that I'm aware of.

- Q. Had the boundaries of any election precinct or school enrollment zone been the subject of discussion with any developers or builders within the district?
- A. Not that I'm aware of. In knowing my history of working with school districts, when a developer is

making decisions on where to build, they want to know the facts about what schools they would go to so that that's what they can start tabbing as they're building.

So it's information they need. So I imagine those discussions have happened as different areas have been built up just to make sure that they're -- they know that.

- Q. Have the boundaries of any election precinct or school enrollment zone been the subject of discussion with any homeowners associations or subdivisions or neighborhood groups?
 - A. Not that I'm aware of.
- Q. Has the district ever investigated the extent to which the ethnic and racial demographics that differ between the north and south sides of I-10 are the result of restrictive zoning that was adopted in the Memorial Villages when they were incorporated?
- A. No. We've never investigated that, nor are aware of anything like that.
- Q. We earlier discussed the fact that the racial and ethnic demographics of the Memorial Villages vary dramatically from the racial and ethnic demographics of the north side of the district, right?
 - A. Yes.

Q. Yet the district's never looked into why those patterns exist?

- A. Not in any way in the sense to educate the students that show up.
- Q. So is it the district's position that it is ignorant of the cause of the ethnic and racial demographics that vary between the communities on the north and south sides of I-10?

MR. CRAWFORD: Objection; form.

- A. We're aware that there are differences, but why it's happened, no, we don't know.
- Q. (BY MR. ABRAMS) Has the district ever investigated why the dramatically different demographics exist between the north and south side residential areas of the district?
- A. In the sense that we know that there's more a lower socioeconomic level on the north side. We also have a lot more apartment complexes and such that would lead to that potential.

More families leaving -- living in a closer area and in lower cost housing indicates a lower socioeconomic level. And most of the homes on the south side are more expensive, so that indicates a higher level of socioeconomic, not necessarily deal with race, though.

1 Has the ever investigated the fact that 0. 2 multifamily housing is not permitted under the zoning 3 ordinances of the Memorial Villages, which translates 4 into there not being apartments? 5 Α. Wouldn't investigate it. We know that 6 different villages have their own deed restriction, 7 yes. 8 Has the district ever looked at the history 0. 9 of the incorporation of the Memorial Villages, which 10 was in 1954 and 1955, shortly after the United States 11 Supreme Court decision in Brown versus Board of 12 Education, which inte -- which required integration of 13 schools? 14 No, has not investigated that. Α. 15 Does the district acknowledge that the 0. 16 Memorial Villages were incorporated in 1954 and 1955? 17 Α. Yes. 18 But the district knows nothing about the Q. 19 history or rationale for their incorporation at that 20 time? 21 Α. No. 22 Is that correct? Q. 23 Α. That's correct. 24 And the district does not claim to have any Q.

understanding about the explanation for the racial and

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ethnic demographics of the residential patterns that vary between the north and south-side communities, correct?

A. Correct.

- Q. What process historically did the district follow when designating early voting locations in the district and what was the rationale for the number and placement of those locations through 2021?
- A. 2011 and prior, we actually only had one early voting site. It was essential administration building.

When we made the change in 2012, it was important to the board because we went from 26 sites down to 7 on election day, to offer some additional sites for early voting to offer the citizens an opportunity.

And so they made the decision to choose a location in the west side that would support the west side and one that would support the east side.

And that's how this location was picked as well as the one at that Holy Cross Lutheran Church.

We also, as part of the agreement with Piney Point, agreed to -- that they would host an early election site at their site, but that was just part of the contract agreement and the very fact that

we have to have one with a city or county in order to host those May elections.

- Q. Did anyone ever discuss the irony of putting a early election site at Piney Point's city hall given that Piney Point city hall is not located in Piney Point and that's why Piney Point has to have its elections at a Spring Branch Independent School District elementary school so it can actually conduct its elections within its own city?
 - A. It was --

MR. CRAWFORD: No objection other than to note that that was a mouthful.

THE WITNESS: Yes.

A. I mean, that --

MR. ABRAMS: Just an observation.

- A. It is, because they actually -- they host meetings and such at our sites too. But yeah.
- Q. (BY MR. ABRAMS) With reference to Exhibit 5, the election precincts and middle school attendance zones, the west side location you said for the attendance zone was basically near where we are here at the Don Coleman Center?
 - A. Yes.
- Q. And looking at Exhibit 5, if we look at Dairy Ashford, it's near -- it's between Memorial and I-10

1 on Dairy Ashford, right? 2 Α. Correct. 3 And it's in the Spring Forest Middle School 4 zone south of the freeway? 5 Α. Yes. 6 Another location is the so-called ad Q. 7 building, now properly known as the Wayne Schaper 8 Leadership Center. And that is located south of I-10, 9 two-thirds of the way to the right, between Echo Lane 10 and Voss on this map. It shows a letter C, I think. 11 Α. Yes. 12 So that location likewise is south of I-10, Q. 13 correct? 14 Α. Correct. 15 The city of Piney Point Village location on 0. 16 Woodway is not depicted, but it's in fairly -- the --17 the fairly southernmost portion of the Spring Branch 18 Middle School zone, correct? 19 Α. Correct. 20 And then the Holy Cross Lutheran Church is on 0. 21 Westview and it is on the easternmost portion of 22 Westview within Hilshire Village, essentially. 23 Can you pick a -- a landmark on 24 Exhibit 5 that will tell us roughly where the Holy 25 Cross early voting location was?

1 A little south and east of 115, the red Α. 2 circle for Valley Oaks. 3 Okay. Q. 4 So south and east of that is... 5 And I believe we earlier talked about the 0. 6 fact that's within Hilshire Village, right? 7 Α. Correct. 8 So up until the -- and through the 2021 0. 9 election, none of the early voting locations were 10 located among the Landrum, Spring Woods, Northbrook, 11 Spring Oaks Middle School attendance zones and none 12 were located north of I-10 other than the one at 13 Hilshire Village? 14 Α. Correct. 15 0. You indicated there's an intention to put in 16 one more early voting location in 2022? 17 Α. Yes. 18 Has the board voted on that? 0. 19 Α. They'll vote on that in January. No. 20 When -- when and in what context have 0. 21 discussions occurred about the potential of adding a 22 new early voting location? 23 Α. After the 2021 election, after analyzing how 2.4 many early votes we had, which was well over 5,000 25 votes, when normally it's less than a thousand votes

in early election and often around 400 or 500, as well as we heard from, I would say a handful, maybe five different people asking us to add an additional early election site last year, which I couldn't at that point because that decision has already been made based on the historical occurrence of how voting fell, we began to ponder where we would have another early election site.

And actually John Knox Presbyterian, the minister from that church that's at Hammerly and Gessner reached out to us and offered their location as a site for early election.

And so we went and looked at their room, what they have, and feel that it will be a good fit for us, mainly because I appreciate that it's on Gessner, which would allow for some public transportation, access to -- easier access to -- to people on the northwest side, because that's who we were hearing from, that they were having some difficulties getting to the early election sites.

- Q. Did the reports from northwest residents about difficulties with early voting sites occur before or after the 2021 election?
 - A. During.

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Q. During the election?

1 (Nodding head.) Α. 2 And what impact does the district acknowledge Q. 3 limiting access to early voting locations may have on 4 the election? 5 We don't believe it limited their access Α. 6 because early elections are over eight different --7 let me get my numbers right -- eight different days 8 which would -- with the weekends as an opportunity to 9 get to early elections as well as they would have 10 their neighborhood middle schools on the election day 11 to vote on. 12 (Marked Porter Exhibit No. 8.) 13 (BY MR. ABRAMS) What day of the week is the 0. 14 regular election held? 15 Α. Saturday. 16 0. Let me hand you what's been marked as 17 Exhibit 8. 18 Do you recognize this as the notice for 19 the last trustee election --20 Α. Yes. 21 -- indicating the various early voting 0. 22 locations? 23 Α. Yes. 2.4 And those are the locations you indicated Q. 25 were in place from 2012 to 2021?

1 Α. Yes. 2 And before that time, there was only one Q. 3 early voting location? 4 Α. Correct. 5 And that was at the Wayne Schaper Leadership 0. 6 Center or then the ad building --7 Α. Yes. 8 -- administration building --0. 9 Α. Uh-huh. 10 -- which is also located on the south side --0. 11 Α. Yes. -- of I-10? 12 Q. 13 Α. (Nodding head.) 14 So before 2012, there were no early voting 0. 15 locations on the north side of I-10, correct? 16 Α. Correct. 17 And after 2012, there's been one early voting 0. 18 location, and that's on the northeast corner of 19 Hilshire Village? 20 Α. Correct. 21 Does the district have any knowledge to --0. 22 about the extent to which can district trustee 23 elections have involved formal or informal candidates 2.4 slating processes? 25 A. Can you define "slating"?

Organized groups that endorse candidates and 1 0. 2 provide slates of candidate to elect. 3 Α. We don't have any knowledge of that. Is that 4 what the question was? I'm sorry. 5 Q. Right. 6 Has the district ever investigated the 7 extent to which in these school board trustee 8 elections there have been formal or informal candidate 9 slating processes where groups endorse candidates? 10 We have not investigated it. 11 In the -- does the district have any Q. 12 knowledge of the extent to which there has been 13 candidate slating either formally or informally during 14 trustee elections? 15 We have no knowledge. 16 Is the district aware of the extent to which 0. 17 during the period 2011 to 2021 any trustee election 18 has involved in the campaign process overt or subtle 19 racial or ethnic appeals? 20 We're not aware of any. I've heard in some Α. 21 recent public comments, I believe it was Noel --22 Referring to Mr. Lezama? Q. 23 Α. Yes. 2.4 Thanks.

Q.

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Α. Mr. Lezama. Q. Thank you.

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A. -- talked to some of that happening during his campaign.

And I know he talked with a newspaper reporter. That's all I'm aware of. I don't have any documentation of that happening.

If things like that were brought to my attention, we would always recommend that people report that to the appropriate either Secretary of State or Ethics Commission because they're the ones that actually oversee the campaigning process of elections.

- Q. Apart from the recent reports by Mr. Lezama about racial or ethnic communications during his campaign, does the district have any awareness of any other campaigns in which similar communications were distributed?
 - A. No, not aware.
- Q. Does the district have access to the 2020 Census and American Community Survey information?
- A. I understand it's in the hands of our demographer, but, no, we, ourselves, haven't seen any reports from that census data.
 - Q. Who is the district's demographer?
- A. Davis Templeton, I believe, is the name. I

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don't know if that's the completely -- there might be another name on the title. I know Ms. Templeton.

- Q. Is Davis Templeton, independent of the lawsuit, charged with any responsibilities to assist the district on demographic matters?
- A. They help us with enrollment projections, mainly. That's where we've -- where we've used their data before, what they acknowledge -- you know, they're able to track, you know, what developing -- developments are in play, like who has put in permits and things like that, to let us know that homes are being built or apartments are being built to prepare us for influx of kids.
- Q. What role, if any, do you understand Davis
 Templeton is currently undertaking to analyze the 2020
 Census or American Community Survey demographic
 information for the district?
- A. Primarily to help us with the enrollment trends that are happening. Because our information is provided in the census, like racial breakdown, that could give us some indication of some areas that are starting to grow to ensure that we're prepared to provide, you know, supports that don't necessarily come with the race but might come with other things tied to them, primarily socioeconomic needs.

Does the district know what the current 1 0. 2 percentage of citizenship voting age population for 3 voters in the district is by race and ethnic group? 4 Α. No, we don't know that. 5 (Marked Porter Exhibit No. 9.) 6 Q. (BY MR. ABRAMS) Let me hand you what's been 7 marked as Exhibit 9. 8 Exhibit 9 is a document the district produced 9 with Bates No. SBISD 798 titled "Spring Branch ISD 10 10-Year Per Student Cost General Fund." 11 What does this document show? 12 Α. This takes the expenditures that happened out 13 of our -- specifically out of our general fund and 14 using the student enrollments at -- on each of those 15 years to determine a per student cost of actual 16 expenditures. 17 Out of that general fund, we've also 18 indicated by highlighting in each year what campuses 19 were considered Title I campuses. 20 Earlier in your testimony, I asked you about 0. 21 Title I campuses. 22 And does Exhibit 9, by its highlighting, tell us all which of the campuses are Title I 23 2.4 campuses? 25 Α. Yes.

And a Title I campus requires that what percentage of the students are eligible for free and reduced lunch? Α. At least 45 percent and definitely over 50 percent. A campus can fluctuate year to year. And so once they meet Title I standards or once they meet the Title I threshold, they could drop a little bit, you know, if one year just a few less kids fill out the form and then, you know, come back up. But I would say need at least 45 to 50 percent of free and reduced lunch. I want to kind of go behind the numbers to Q. understand what differences in funding exist and how general fund dollars are allocated that result in the differences. Α. Okay. With reference to the 2019-2020 figures, for 0. example, I see different per student averages.

What factors can result in the differential on per student expenditures among the different schools because I assume that all the Title I influences separate and apart from this sheet, right?

A. Correct.

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Q. So Exhibit 9 doesn't reflect any Title I

1 funding, which would flow through campus -- two 2 campuses that have economically disadvantaged 3 students, right? 4 Α. Correct. 5 What explanations are there for the per 0. 6 student differentials reflected in Exhibit 9? 7 Α. There's several pieces of data that affect 8 that. 9 For one, the actual enrollment of 10 students. When you consider a campus, every campus 11 has to have a principal, for instance. And so more or 12 less students spreads out that cost per student. So 13 definitely the enrollment of students as well as the 14 programs at those campuses. 15 For instance, if you look at an 16 elementary school, Bendwood School --17 0. Yes. Sure. 18 -- that has very specialized special 19 education programs there. Much, much lower 20 student-teacher ratios and things like that. 21 So they're going to have -- by nature of 22 their programatic happening specific to their campus 23 is going to, you know, produce more dollars there. 2.4 We also look at specific programs that 25 happen at each campus, CTE programs, for instance, as

well as specific special education programs. Not every campus hosts every program there.

Another thing we do look at that free and reduced lunch percentage. And if you -- depending on how many kids were reported with an approved free and reduced lunch application, we then give additional staffing and dollars for those -- at those campuses.

So a campus with a higher free and reduced lunch percentage by design would receive additional dollars towards staffing or additional -- well, towards spending in programs and then additional staffing allocations.

- Q. And the factors that I've heard so far that would be an explanation for why there are differential per student expenditures start with enrollment.
 - A. Uh-huh.
- Q. If you have fewer students, then the costs are spread among fewer students. That's one factor, correct?
 - A. Uh-huh.
 - Q. A second -- is that a "yes"?
- A. Yes.

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Q. A second factor is there really are some specialized campuses. You used Bendwood as an example, which is not akin to a traditional elementary

school?

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- A. Correct.
- Q. A third factor is there's some campuses where there are specialized programs such as CTE or special ed where the dollars are tracked to that campus, but they correspond to a specialized program?
 - A. Yes.
- Q. And then the fourth factor is some additional amount allocated to campuses that exceed some threshold for free and reduced lunch children?
 - A. Correct.
- Q. Is there a per student stipend or per student add-on that corresponds to this fourth factor, the free and reduced lunch?
- A. Primarily, we see it in the staffing allocations at the high schools where they're based on their the counts. And I -- may not be exact, but I want to say, you know, for every 25 or 30 free and reduced lunch kits, they get an additional staffing unit. Something along that line.
 - Q. So there's some ratio --
- A. Yes.
- Q. -- that determines how much additional funding goes to a campus based upon the number of free and reduced lunch children?

A. Primarily at the secondary campus, yes.

Q. Are there any other significant factors that go into explaining the differential expenditures reflected on Exhibit 9 on a per student basis out of the general fund other than what you've told me?

A. We also have campuses that are considered catalyst schools. That's our definition of schools that are struggling to meet the requirements by the State to be considered -- passing might be the terminology.

And so in some cases we've allocated an additional position or supports at those campuses to help them analyze data to help them ensure kids are getting the specific support on the specific subject that they need.

- Q. Where within the system are these budgetary and staffing decisions made to reallocate funds from the districtwide average?
- A. Probably with -- it starts at administratively. We look at the trends and the needs. We look to see what those costs would be.

Also, I would say in cohort with the board defining their goals, that's actually -- we watch what the needs are. We look at the board goals.

And more than likely, they're often in

line in the sense that, for instance, numeracy and literacy, superintendent goals, board goals, focus needs to be made on that.

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So we've ensured -- you've heard people talk about the federal dollars we've got in the ESSER dollars. Those specifically, quite a bit of it, are very focussed on numerous needs at -- to help the entire district. And then those are assigned to campuses that need that.

So the decision, you know, we -- however then have to analyze can we handle the budget costs. That case we specifically had ESSER dollars. In another case, if we didn't have those types of dollars, we would have to analyze our programs and determine what programs aren't as supportive of what we need.

So I would say between the administration and the board, the board ultimately approves the budget.

- Q. Right. I was going to say I know that as a legal matter the board has to approve the budget, but I also suspect as a practical matter administratively you have to roll up to the board level --
 - A. Absolutely.
 - Q. -- with your line items.

A. Yes.

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Q. And those begin with the -- with the administrative staff?

- A. With the administrative staff down to, I mean, campuses are given their allotments and departments --
 - Q. Okay.
- A. -- you know, have their requests and bring us their budget.
- Q. During the period from 2011 to 2021, the last decade, has the district either received or published information about whether it should or shouldn't change its method of elected trustees?
- A. I know in the recent year there's been various e-mails. I haven't seen them specifically. I've just heard talk about e-mails that board members have received, talking about whether or not -- from both sides of the argument, whether or not we should switch or not, especially tied to once the lawsuit was filed, not really leading up to it.

I know, again, going back to that there was a discussion in 2020, obviously with the board, tied to -- I mean, at that time, you know, over that previous year, several school districts in the north side of Texas had been sued basically under this --

relatively same premise.

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I know there's some different facts there. And the board recognized that the diversity of our school district appears to not be literally represented on the school board, and so just wanted to see what the options were to ensure that we were getting that participation.

So I know that type of discussion has happened, but other than the more recent comments really tied to the lawsuit, I'm not aware.

- Q. Between the time of the 2020 presentation by the district's lawyers until the lawsuit, did the district undertake any other discussions or investigations of whether or not it would consider changing its electual [phonetic] system?
- A. No. They were waiting for the results from the 2020 Census to determine if the need.
- Q. Has the district made any attempt to collect and produce the e-mail communications, which you indicated it has received, concerning whether or not it should change its method of elected trustees?
- A. My understanding is there may have been some public information requests that some of those e-mails might have come a part of, but that's all I know.

I don't know of any specific collection

just for the purposes to see what -- you know, to account for who was supportive or not supportive of changing.

- Q. Has the district requested from its trustees copies of communications they have received in their capacity as trustees concerning whether or not the district should change its method of electing its trustees?
- A. I believe it's -- if it's been requested through public information requests, then those requests have been made; but I don't know, again, of the specific requests.
- MR. ABRAMS: Charles, we'll talk separately about it. We made such a request and we didn't get anything, and so I think there was a suggestion that maybe we needed to define search terms.
- MR. CRAWFORD: My understanding was -MR. ABRAMS: You and I can talk about
 that separately.
- MR. CRAWFORD: Sure. Yeah, that was my understanding, is that Chris was waiting for some search terms from you so that we could -- because apparently there's a large volume of e-mails that might come up. So he was trying to narrow that down.

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    That hadn't happened yet, and we're in the process.
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                   MR. ABRAMS: That would be a subject for
 3
     our discussion.
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                   MR. CRAWFORD:
                                   Sounds great.
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                   MR. ABRAMS: No need to trouble
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    Ms. Porter with that.
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              (BY MR. ABRAMS) I'm now going to turn --
         Q.
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     actually, let me see. We're almost at the hour mark.
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    And I'm closing in on a series of questions that are
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     going to go back to the allegations in the lawsuit.
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              If you're ready, this might be a good time to
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     take another one of our short breaks and we might be
13
     able to close this out after our next break.
14
         Α.
              Sounds great.
15
         Q.
              Okay?
16
         Α.
              Okay.
17
                   (Break from 11:23 a.m. to 11:31 a.m.)
18
              (BY MR. ABRAMS) Ms. Porter, I now want to
         Q.
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    visit with you about topics in the notice of
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    deposition that concern some of the factual
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     allegations in the lawsuit and the district's stated
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    position when it answered, just to give you a
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    heads-up.
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              In the defendant's answer, it denied that its
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     election system violates the Voting Rights Act or
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1 denies minority voters' rights. 2 My question is: Before the district filed 3 that denial, what investigation and analysis did it 4 do? 5 I don't know of a specific investigation or analysis that we did. It was just the belief that we 6 7 were not denying their rights. 8 Can you confirm that before filing that 9 denial the district did not conduct an investigation 10 into whether or not the allegations were true? 11 MR. CRAWFORD: Objection; form. 12 Α. Can you word it again, because I just lost 13 how I would answer that? I'm sorry. 14 (BY MR. ABRAMS) Yes, ma'am. 0. 15 Α. The proper word. 16 Q. Yes, ma'am. I'll ask you again. 17 Before the district denied that its 18 conduct violates the Voting Rights Act or denies 19 minority voters rights under that act, can you confirm 20 the district did not conduct any investigation or 21 analysis of that subject? 22 MR. CRAWFORD: Objection; form. 23 Yes, I can confirm that. Α. 24 (BY MR. ABRAMS) In Paragraph 8 of the Q.

district's answer -- and by the term "district," now

1 I'm referring to the district and its trustees that 2 have been sued in their official capacity --3 Α. Yes. 4 0. -- with the defendant's answer. 5 The defendants denied that its at-large 6 system was the reason that the plaintiff lost in the 7 most recent election. 8 Before making that denial, can you 9 confirm that the district did not conduct any 10 investigation or analysis of that allegation? 11 MR. CRAWFORD: Objection; form. 12 Α. We did not do any investigation. 13 (BY MR. ABRAMS) In the defendant's answer, 0. 14 the district denied that its elections involve 15 racially polarized voting. 16 Can you confirm that before the district 17 denied that allegation it did not conduct any 18 investigation or analysis of the truth or falsity 19 of -- of that fact? 20 MR. CRAWFORD: Objection; form. 21 Α. We did not do any investigation. 22 (BY MR. ABRAMS) In Paragraph 48 of its Q. 23 answer, the district denied that Spring Branch's 24 neighborhoods evidence a history of residential

segregation and racial conflict.

1 Before denying that, did the district conduct 2 any investigation or analysis of whether that fact is 3 true? 4 MR. CRAWFORD: Objection; form. 5 Α. We had no history. We -- we knew of no 6 history of that happening, so we did not do any 7 additional investigation. 8 (BY MR. ABRAMS) Does the district know one 9 way or the other whether in the school board elections 10 during the 10-year period 2011 to 2021 involved a 11 majority of its white voters supporting different 12 candidates than did the majority of its Hispanic and 13 African-American voters? 14 We did not know that. Α. 15 0. Don't know one way or the other? 16 Α. Correct. 17 0. Maybe happened, maybe didn't happen? 18 That's correct. Α. 19 And the district's not investigated whether Q. 20 or not that happened? 21 Α. Correct. 22 Has the district investigated whether or not Q. 23 in the most recent school board trustee election in 24 2021 the majority of the white voters supported the

white candidates and that amount exceeded the number

1 of white voters who supported the plaintiff? 2 Α. We have --3 MR. CRAWFORD: Objection; form. 4 Α. We have not investigated that. 5 (BY MR. ABRAMS) Might be true, might not be 0. 6 District doesn't know? true? 7 Α. We do not know. 8 In Paragraph 53 of the defendant's answer, 9 the defendants denied that district elections are 10 deeply racially polarized. 11 Before denying that allegation, had the 12 district conducted any investigation or analysis of 13 whether or not that allegation was true? 14 MR. CRAWFORD: Objection; form. 15 Α. No. 16 Q. (BY MR. ABRAMS) In Paragraph 58 of the 17 defendant's answer, the defendants denied that the 18 district has enacted any barriers to voting. 19 Before making that denial, had the district 20 conducted any investigation or analysis of whether or 21 not that allegation is true? 22 MR. CRAWFORD: Objection; form. 23 Α. No. (BY MR. ABRAMS) Does the district 24 Q. 25 acknowledge that the location of its early voting

sites provides an impediment to voters on the north side of the district to vote -- early vote?

- A. Based on responses or comments I received during this election, I realized I would be better serving the voters of the district if I put another one on the northwest side. But going into the election, we did not believe that was an impediment.
- Q. Does the district acknowledge that the location of its early voting sites has an impact on voter turnout?
 - A. I don't know.

Q. In Paragraph 75 of the defendant's answer, the district made the statement that single-member districts can promote balkanization of a school district by electing trustees who are only focused on the interest of the constituents of their smaller single-member districts and not necessarily on the overall good of the school district.

Before making that statement and its answer, had the district investigated whether or not the existing body of social science research contradicts that statement?

MR. CRAWFORD: Objection; form.

A. Nothing scientific. No scientific investigation. The -- there's fear -- an underlying

fear in all school districts that that potentially can happen with single-member districts.

- Q. (BY MR. ABRAMS) What analysis has the district ever conducted to determine whether in school districts with single-member districts that negative effect has occurred?
 - A. No investigation.

Q. What, then, was the source of this fear that the district voiced in its answer that single-member districts might have negative impacts?

MR. CRAWFORD: Objection; form.

A. No specific source. Just the belief that they represent the entire district as the board stands now at the at-large.

It was more a strong belief that the at-large system can support and represent the entire district.

Q. (BY MR. ABRAMS) In Paragraph 75 of its answer, the defendants claim that there are, quote, sound nonrace-based policy reasons for maintaining at-large voting systems, close quote.

What are those sound nonbased -- nonrace-based policy reasons?

- A. Can you repeat that question?
- Q. In Paragraph 75 of the defendant's answer, it

A. Is that -- I'm sorry, is that on this, so I can read it as you say it?

- Q. Sure. If you look at Topic 38, if I've accurately created my notes.
 - A. Yes. I'm sorry.
 - Q. Are you with me, Topic 38?
 - A. Yes.

Q. I'm asking you about the last part of that topic, which is the assertion by the defendants that there are, quote, sound nonrace-based policy reasons for maintaining at-large voting systems.

What's the factual basis for the district's position?

A. That everybody who is a voting citizen has the right to vote for whoever they want to and regardless of race throughout the district at every election.

That is not limited to only certain elections. And that's because we are an at-large system.

Q. Does the district acknowledge, in light of its awareness of litigation involving other Texas school districts, that the Voting Rights Act assures that the voting strength of its minority voters is not

1 to be diluted by the majority? 2 Α. Yes, they understand that. 3 Does the district acknowledge that there are 0. 4 sound policy reasons for adopting a single-member 5 district plan as has been the case in various other 6 Texas school districts? 7 MR. CRAWFORD: Objection; form. 8 Single-member districts would ensure that Α. 9 specific minority groups have an opportunity to be 10 represented as required by the Texas voters' rights. 11 (BY MR. ABRAMS) So the district acknowledges Q. 12 that there are also sound policy reasons for adopting 13 a single-member plan just as there are some policy 14 reasons that support maintenance of an at-large plan? 15 MR. CRAWFORD: Objection; form. 16 Q. (BY MR. ABRAMS) Correct? 17 Α. Correct. 18 And one of the policy reasons supporting the Q. 19 adoption of single member plans is that those plans 20 may allow minority voters references to be better 21 reflected in the election results? 22 MR. CRAWFORD: Objection; form. 23

Α. That's possible. Correct.

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(BY MR. ABRAMS) In Paragraph 76 of the Q. defendant's answer, the defendants denied that its

1 system for electing trustees dilutes the voting 2 strength of racial or language minorities. 3 Before making that denial, what investigation or analysis had the district conducted to determine 4 5 whether or not that allegation was true? 6 MR. CRAWFORD: Objection; form. 7 Α. No investigation. 8 (BY MR. ABRAMS) In Paragraph 79 of the 9 defendant's answer, the district denied that it had 10 done anything which gave the Latino community or any 11 other minority citizens less of an opportunity to 12 participate in the political process, before making 13 that denial what investigation or analysis had the district conducted of that allegation to determine 14 15 whether or not it's true? 16 MR. CRAWFORD: Objection; form. 17 Α. No specific investigation. 18 (BY MR. ABRAMS) Do you believe you've Q. 19 understood my questions here today except for when you 20 told me you didn't? 21 Α. Yes. 22 And when you told me you didn't, did I work Q. 23 with you until I asked you a question that you did

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understand?

Α.

Yes.

1	Q. Are there any of your answers on behalf of
2	the district that you would like to change or correct
3	at this time?
4	A. Not at this time.
5	Q. Okay.
6	MR. ABRAMS: At this time I have no
7	further questions.
8	And I thank you for your courtesy.
9	THE WITNESS: Thank you.
10	MR. CRAWFORD: Thank you. We we will
11	reserve our questions.
12	MR. ABRAMS: Okay.
13	(The deposition concluded at 11:45 a.m.)
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1	MITTANEGO CORRECTIONO AND CICNATURE
	WITNESS CORRECTIONS AND SIGNATURE.
2	Please indicate changes on this sheet of paper,
	giving the change, page number, line number and reason
3	for the change. Please sign each page of changes.
4	PAGE/LINE CORRECTION REASON FOR CHANGE
5	7/3 Certain & this quisting-clary
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	CHRISTINE PORTER
24	DIANE DICKENS 2400814 Diane Dickens
25	2400814 NOTARY PUBLIC, STATE OF TEXAS MY COMMISSION EXPIRES Diane Dickers, notary
	FEBRUARY 7, 2024 Feb. 7, 2024
	\$3,53,53,53,53,54,54,64,64,64,64,64,64,64,64,64,64,64,64,64

1 SIGNATURE OF WITNESS 2 3 I, CHRISTINE PORTER, solemnly swear or affirm 4 under the pains and penalties of perjury that the 5 foregoing pages contain a true and correct transcript 6 of the testimony given by me at the time and place 7 stated with the corrections, if any, and the reasons 8 therefor noted on the foregoing correction page(s). 9 10 11 CHRISTINE PORTER 12 13 14 15 16 Job 70024 17 18 19 20 21 22 23 Diane Dickens, notary Feb. 7, 2024 DIANE DICKENS 24 2400814 ARY PUBLIC, STATE OF TEXAS 25 MY COMMISSION EXPIRES FEBRUARY 7, 2024

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1
               IN THE UNITED STATES DISTRICT COURT
 2
                     COURT FOR THE SOUTHERN
               DISTRICT OF TEXAS HOUSTON DIVISION
 3
 4
     VIRGINIA ELIZONDO,
         Plaintiff,
 5
                             Civil Action No. 4:21-CV-01997
     V.
 6
      SPRING BRANCH
7
      INDEPENDENT SCHOOL
     DISTRICT, ET AL.,
 8
        Defendants.
 9
                    REPORTER'S CERTIFICATION
               ORAL DEPOSITION OF CHRISTINE PORTER
10
                       DECEMBER 28, 2021
11
         I, Mendy A. Schneider, a Certified Shorthand
12
    Reporter in and for the State of Texas, hereby certify
13
     to the following:
14
         That the witness, CHRISTINE PORTER, was duly sworn
15
    by the officer and that the transcript of the oral
16
    deposition is a true record of the testimony given by
17
     the witness;
18
         That the deposition transcript was submitted on
19
             ____, 2022, to the witness, or to the
20
     attorney for the witness, for examination, signature,
21
     and return to Worldwide Court Reporters, by
22
             , 2022;
23
         That the amount of time used by each party at the
24
    deposition is as follows:
25
              MR. ABRAMS - 01:19:22
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1 That pursuant to information given to the 2 deposition officer at the time said testimony was 3 taken, the following includes counsel for all parties 4 of record: 5 MR. BARRY ABRAMS AND MR. MARTIN GOLANDO, Attorneys for Plaintiff. 6 MR. CHARLES J. CRAWFORD, Attorney for Defendants. 7 8 I further certify that I am neither counsel for, 9 related to, nor employed by any of the parties or 10 attorneys in the action in which this proceeding was 11 taken, and further that I am not financially or 12 otherwise interested in the outcome of the action. 13 Further certification requirements pursuant to 14 Rule 203 of TRCP will be certified to after they have 15 occurred. 16 Certified to by me this _____ 17 18 19 mendySchneider 20 Mendy A. Schneider, CSR NO. 7761 2.1 Expiration Date: 1-31-2023 22 23 24 25

1	FURTHER CERTIFICATION UNDER RULE 203 TRCP
2	The original deposition was was not
	returned to the deposition officer on,
3	2022.
4	If returned, the attached Corrections and
-	Signature page contains any changes and the reasons
5	therefor;
6	
O	If returned, the original deposition was delivered
7	to MR. BARRY ABRAMS, Custodial Attorney;
/	
0	That \$ is the deposition officer's charges
8	to the Attorney for Plaintiff, MR. BARRY ABRAMS, TBA#
0	00822700, for preparing the original deposition
9	transcript and any copies of exhibits;
LO	That the deposition was delivered in accordance
1	with Rule 203.3, and that a copy of this certificate
L1	was served on all parties shown herein and filed with
12	the Clerk.
L Z	
	Certified to by me this
L3	
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L5	Mendy A. Schneider, CSR NO. 7761
	Expiration Date: 1-31-2023
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62:9 83:9,15	Wilson 10:19	zone 48:7 55:22		3 3:11 9:21		
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IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

VIRGINIA ELIZONDO,

Plaintiff,

v.

SPRING BRANCH INDEPENDENT SCHOOL DISTRICT, ET AL.,

Defendants.

Civil Action No. 4:21-CV-01997

NOTICE OF ORAL DEPOSITION

Pursuant to FED. R. CIV. P. 30(b)(6), Plaintiff will take the oral deposition of the corporate representative(s) of Defendant Spring Branch Independent School District ("SBISD"), on Monday, December 20, 2021 at 9:00 a.m. The examination will continue from day-to-day until completed at the offices of Thompson & Horton LLP, 3200 Southwest Freeway, Suite 200, Houston, Texas 77027, or at Defendants' option, at the offices of Blank Rome LLP, 717 Texas Avenue, Suite 1400, Houston, Texas 77002, and may cover the topics identified in Exhibit "A" hereto. SBISD must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on its behalf; and it may set out the matters on which each person designated will testify. The persons designated must testify about information known or reasonably available to the organization. Counsel for Plaintiff is available to confer in good faith about the matters for examination.

The deposition will be transcribed by a certified shorthand reporter and may be videotaped.

All parties are invited to attend and examine the witness as permitted by the Federal Rules of Civil Procedure.

EXHIBIT "A"

DEFINITIONS

- 1. "Person" means the plural as well as the singular and includes any natural person or business, legal or governmental entity or association.
- 2. "Plaintiff' means Plaintiff Virginia Elizondo named in the document titled "Plaintiff's First Amended Complaint" (Dkt.#2 in the case styled *Elizondo v. Spring Branch Independent School District, et al.*), the party's abbreviated name, a pronoun referring to the party, and, where applicable, her employees, partners, or agents acting or purporting to act on her behalf with respect to any of the subjects identified in this Deposition Notice.
- 3. "Defendants" means Spring Branch Independent School District, each of its Trustees in their official capacities, and all representatives, employees, agents, or officers of those designated in the caption of this cause acting or purporting to act on their behalf with respect to any matter inquired about in these Requests for Production.
- 4. "You" or "your" or "yours" means Defendant SBISD and each of its Trustees in their official capacities, their members, attorneys, agents, representatives, and where applicable, SBISD officers, directors, employees, partners, corporate parent, subsidiaries, or affiliates acting or purporting to act on their behalf with respect to any matter inquired about in the Requests for Production, or any person on their behalf.
- 5. The term "Lawsuit" means the case styled *Elizondo v. SBISD*, et al, Cause No. 4:21-CV-01997, in the United States District Court for the Southern District of Texas, Houston Division.
- 6. The term "Complaint" means the Plaintiff's First Amended Complaint, in the case styled the case styled *Elizondo v. SBISD*, et al, Cause No. 4:21-CV-01997, in the United States District Court for the Southern District of Texas, Houston Division.
- 7. Any reference to an individual person, either singularly or as part of a defined group, includes, where applicable, that person's past and present agents, legal representatives, non-legal representatives, personal representatives, attorneys, employees, heirs, successors, and assigns, and also includes individuals and entities who act, have acted, purport to act, or have purported to act on behalf of such individual person.
 - 8. The singular includes the plural and vice versa.
 - 9. The masculine gender includes the feminine and vice versa.
- 10. All other terms are to be interpreted in accordance with their normal usage in the English language.

EXAMINATION TOPICS

- 1. The claims and factual allegations in the Complaint and Defendants' Original Answer to Plaintiff's First Amended Complaint.
- 2. Whether there is any past history of official discrimination in SBISD, the City of Houston, the Cities of Hunters Creek Village, Piney Point Village, Bunker Hill Village, Hedwig Village, the Spring Valley Village, Hilshire Village, Harris County, or the State of Texas, concerning the right of the members of a minority group to register, to vote, or otherwise participate in the democratic process, and any SBISD investigation into and knowledge about whether any such history exists. The term "past history of official discrimination" refers to any prior official customs, policies or practices of a government entity adversely affecting the rights of any minority group members.
- 3. Whether past voting in the elections of SBISD, the City of Houston, the Cities of Hunters Creek Village, Piney Point Village, Bunker Hill Village, Hedwig Village, the City of Spring Valley Village, Hilshire Village, Harris County, or the State of Texas has been racially or ethnically polarized, and any SBISD investigation into and knowledge about whether any such polarization has existed. The term "racially polarized" means that there is a consistent relationship between the race or ethnicity of the voter and the way in which the voter votes and that white voters and minority voters vote differently.
- 4. The process by which SBISD has chosen to use election precincts based upon middle school attendance zones during the period from 2011-2021, and the rationale for that decision.
- 5. The process by which SBISD has chosen early voting locations and the rationale for those decisions during the period from 2011-2021.
- 6. The extent to which SBISD trustee elections have involved formal or informal candidate slating processes during the period from 2011-2021 and any SBISD investigation into and knowledge about any such processes.
- 7. The extent to which past SBISD trustee elections during the period from 2011-2021 have involved any overt or subtle racial or ethnic appeals, and any SBISD investigation into and knowledge about any such appeals. The term "overt or subtle racial or ethnic appeals" means communications that tend to disparage a political candidate on the basis of his or her membership in an identifiable racial or ethnic group.
- 8. All investigations conducted by SBISD to determine whether any Hispanics, Latinos, or Mexican-Americans have ever been elected to public office in SBISD.
- 9. All investigations by SBISD to determine whether any African Americans have ever been elected to public office in SBISD.
- 10. All investigations by SBISD to determine whether any residents of Asian American heritage have ever been elected to public office in SBISD.
 - 11. The results of SBISD trustee elections from 2011-2021.
- 12. The contents of demographic data from the 2020 Census and American Community Survey regarding the ethnicity and races of voters within SBISD and any SBISD investigation into and knowledge about that data.
- 13. The current Citizenship Voting Age Population of voters in SBISD, the race and ethnicity of all such voters, and any SBISD investigation into and knowledge about that data.

- 14. SBISD investigations into and knowledge about socio-economic disparities existing between Anglo and minority students in SBISD for the period 2011-2021.
- 15. All complaints SBISD has received about alleged instances of racial or ethnic discrimination affecting students, residents or employees within SBISD, and SBISD investigations into and knowledge about any such complaints of alleged racial or ethnic discrimination.
- 16. The processes by which SBISD has developed and established its student school attendance zones, including the racial, ethnic and socio-economic characteristics of each such attendance zone and the rationale for each such zone.
- 17. The most recent available State mandated academic assessment results on a per school basis for each SBISD campus.
- 18. The most recent available data about SBISD expenditures on a per-student basis for Title I and non-Title I schools in SBISD, excluding Title I funds
- 19. The racial and ethnic composition of the students on each SBISD campus during the period from 2011-2021.
- 20. The racial and ethnic composition of the teachers, administrative staff and employees on each SBISD campus during the period from 2011-2021.
- 21. The racial and ethnic composition of SBISD employees who are neither teachers nor administrators for SBISD during the period from 2011-2021.
- 22. The racial and ethnic composition of all SBISD employees working at The Wayne F. Schaper, Sr., Leadership Center during the period from 2011-2021.
- 23. The racial and ethnic composition of district-wide SBISD administrative staff during the period from 2011-2021.
- 24. The racial and ethnic composition of certified peace officers in the SBISD police department during the period from 2011-2021.
- 25. The provision and assessment of bilingual educational services to SBISD students during the period from 2011-2021, including any analyses of the success or lack of success of such programming.
- 26. How and the extent to which SBISD has implemented the use of deputy student registrars allowed by TEX. ELEC. CODE §13.046 during the period from 2011-2021.
- 27. All communications received by SBISD or published by SBISD during the period from 2011-2021 concerning whether or not SBISD should change its method of electing school board trustees.
- 28. Any investigation that SBISD has conducted during the period from 2011-2021 concerning whether or not SBISD should change its method of electing school board trustees.
- 29. All communications exchanged by, between, among, or sent by or received from a SBISD trustee with any other person concerning changing SBISD's method of electing school board trustees, during the period 2011-2021.
- 30. The factual basis for the allegation in paragraph 3 of Defendants' answer (Dkt. #8) which states, "Defendants ... deny that the District's election system violates the Voting Rights Act or has denied minority voters any right protected by the Voting Rights Act," including any investigation and analysis that SBISD claims supports that allegation.

- 31. The factual basis for the allegation in paragraph 8 of Defendants' answer (Dkt. #8) which states, "The Defendants deny that the at-large system was the reason for [Plaintiff's] losses..[in SBISD elections]," including any investigation or analysis that SBISD claims supports that allegation.
- 32. The factual basis for the allegation in Defendants' answer (Dkt. #8) that voting in SBISD school board trustee elections has not involved a pattern of racially-polarized voting, including any investigation or analysis that SBISD claims supports that allegation.
- 33. The factual basis for SBISD's allegation in paragraph 48 of its answer (Dkt. #8) which states, "the Defendants deny that SBISD's neighborhoods evidence a history of residential segregation and racial conflict," including any investigation or analysis that SBISD claims supports that allegation.
- 34. Whether in SBISD school board trustee elections during the period 2011-2021 the majority of its Anglo voters supported different candidates than did the majority of its Hispanic and African-American voters.
- 35. Whether in the most recent SBISD school board trustee election the majority of Anglo voters supporting the Anglo candidate and that amount exceeded the number of Anglo voters who supported Plaintiff.
- 36. The factual basis for the allegation in paragraph 53 of Defendants' answer (Dkt. #8) which states, "the Defendants deny that elections in SBISD are deeply racially polarized," including any investigation or analysis that SBISD claims supports that allegation.
- 37. The factual basis for the allegation in paragraph 58 of Defendants' answer (Dkt. #8) which states, "the Defendants affirmatively state that the District has not enacted any barriers to voting," including any investigation or analysis that SBISD claims supports that allegation.
- 38. The factual basis for, investigation of and any analyses on which SBISD purports to rely in support of the allegations in paragraph 75 of Defendants' answer (Dkt. #8) which states, "single-member districts can promote the Balkanization of a school district, by electing trustees who are only focused on the interests of the constituents of their smaller single-member district, and not necessarily on the overall good of the school district. The Defendants assert that there are sound non-race-based policy reasons for maintaining at-large voting systems."
- 39. The factual basis for, investigation of and any analyses on which SBISD purports to rely in support of the allegation in paragraph 76 of Defendants' answer (Dkt. #8) which states, "Defendants specifically deny that the District's electoral system dilutes the voting strength of racial or language minorities."
- 40. The factual basis for, investigation of and any analyses on which SBISD purports to rely in support of the allegation in paragraph 79 of Defendants' answer (Dkt. #8) which states, "the Defendants specifically deny that anything the District has done gives the Latino community or any other minority citizens less of an opportunity to participate in the political process."
- 41. Whether SBISD received or is aware of any citizen complaints concerning the manner in which it conducted school board trustee elections during the period from 2011-2021.
- 42. Whether SBISD has received any complaints of disparate disciplinary treatment of minority students during the period from 2011-2021 and any investigations or analyses of the merits of any such complaints.



Spring Branch Independent School District Inspiring minds. Shaping lives.

There's so much to be proud of in SBISD!

We believe a great school system:

Builds on the strengths and gifts of Every Child;

Provides students from poverty the same opportunity for success after high school as students from non-poverty homes;

Instills in Every Child the belief that they can achieve more than they think possible; and,

Ensures that every adult in the system is committed to the successful completion of some form of higher education for Every Child.

Learn more:

www.springbranchisd.com

955 Campbell Road, Houston, Texas 77024 713.464.1511

Our Values



Every Child

We put students at the heart of everything

- · Every child. Every day. Every minute, Every way.
- . What's Best for the Child Drives the Decision
- Infinite Possibilites Through Education



Collective Greatness

We, as a community, leverage our individual strengths to reach challenging goals.

- Surpass Expectations
 - . Everyone's Work Matters
- . Diversity Makes Us Stronger Collaborative Spirit

We believe in each other and find joy in our work.

- . Each of Us is Committed to All of Us
- . Together We're Better
- · Assume the Best



Moral Compass

Limitless Curiosity

We never stop learning and growing.

- Empowered to Innovate
- · Tenaciously Embrace Challenges
- Unleashed Potential

Moral Compass

We are guided by strong character, ethics and integrity.

- · Personal Responsibility
- . Kindness and Mutual Respect
- Trustworthiness

Our Priorities

We're focusing on literacy, numeracy, social-emotional learning, career and technical education (CTE) and digital expansion.

Our District



Students



Schools







Our Students



Our Bond

We've had a strong start to the 2021-22 school year. We welcomed students back to two newly-rebuilt campuses, Hunters Creek Elementary School and Landrum Middle School. These projects and other rebuilds and facilities upgrades are possible because of voter support for our \$898 million 2017 Bond program.

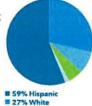
springbranchisd.com/bond

Demographics





58% Economically 37% English Learners As of PEIMS 2020-21



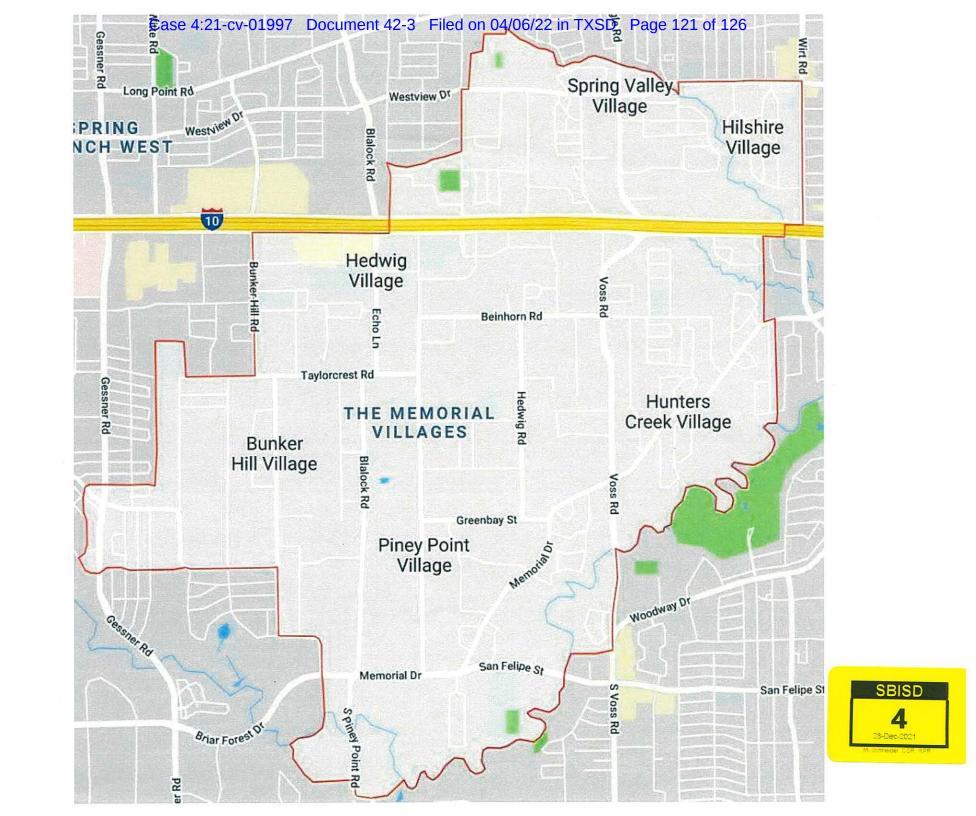
3 7% Asian **5%** African American 2% Other

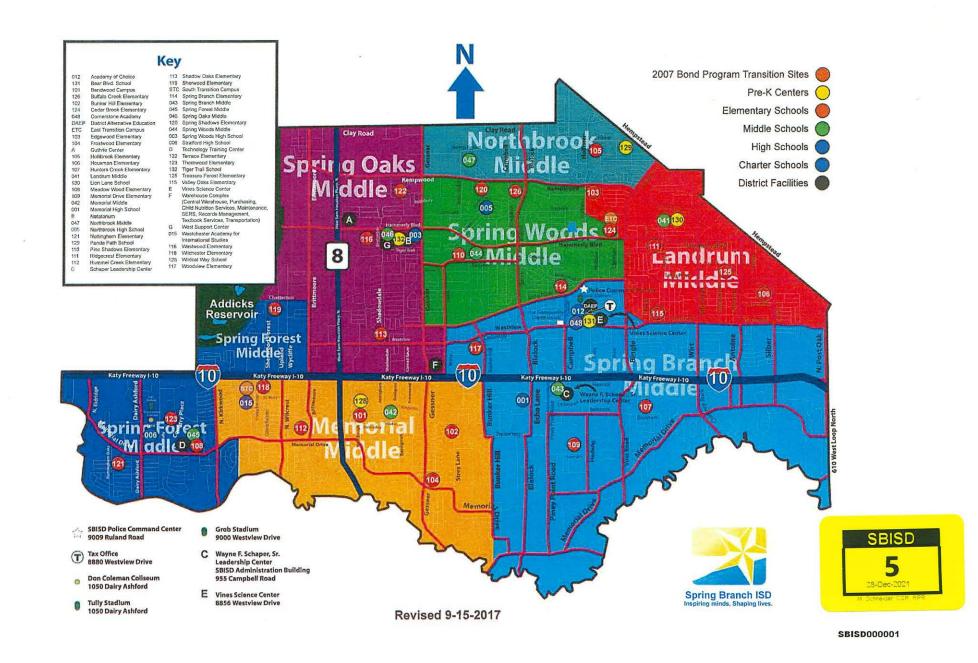
SBISD

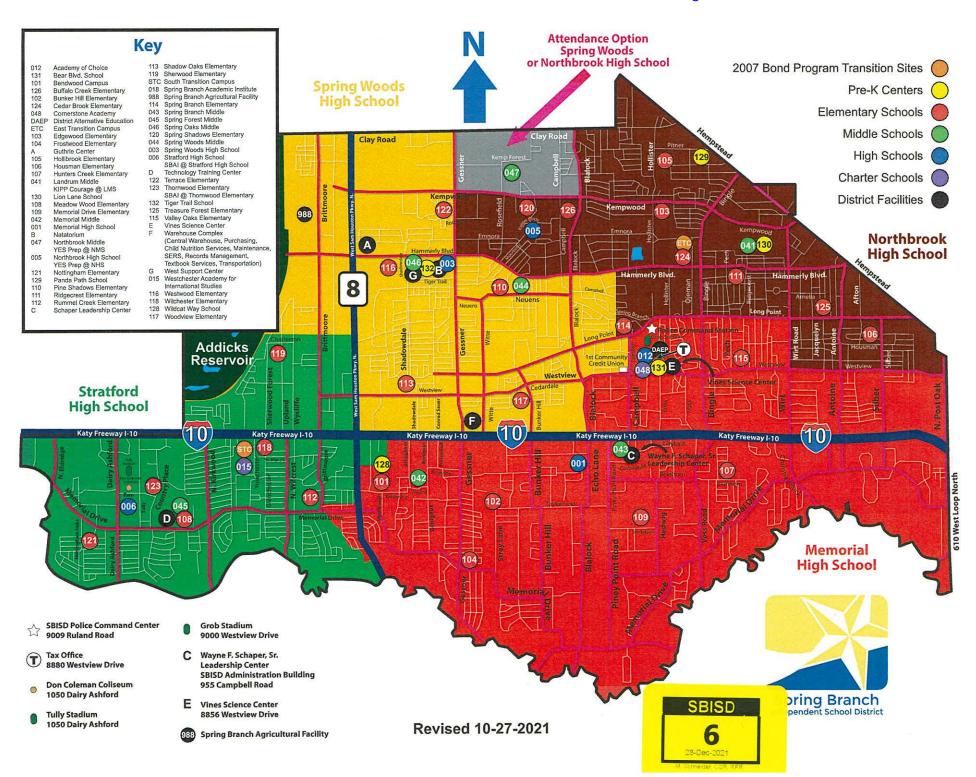
2010 – 2021 List/Names of all Candidates

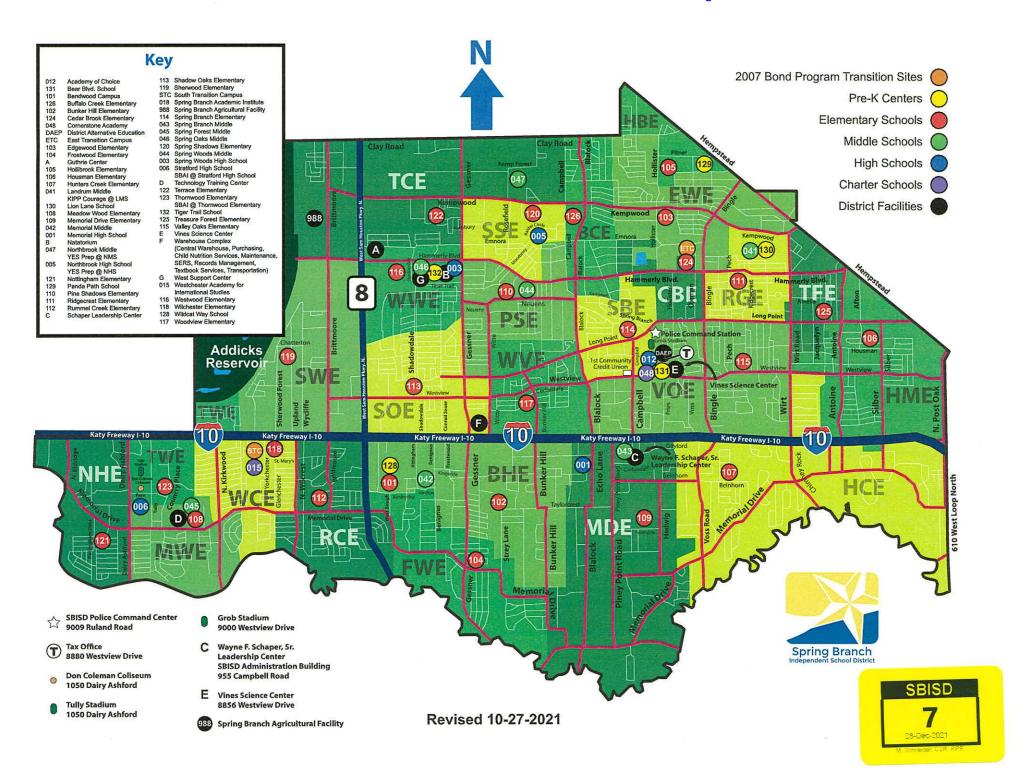
Year	Trustee Position	Name of Candidate
2010	5	Bob Stevenson
	6	Pam Goodson
		Susan Mathews
	7	Mike Falick
2011	1	Wayne F. Schaper, Sr.
		Michael Hawkins
	2	Mary Grace Landrum
2012	2 (2yrs. Unexpired term)	Kelly Tronzo
		Chris Gonzalez
	3	Katherine L. Dawson
		Kay Overly Peeples
		Eric Charles Waligura
	4	Chris Vierra
2013	5	Bob Stevenson
	6	Pam Goodson
	7	John Buchanan
		Karen Peck
2014	Election Cancelled	
2015	3	Katherine L. Dawson
		Craig Adams
	4	Virginia Elizondo
		Chris Vierra
2016	5	J. Carter Breed
		Julie Jaehne
	6	Pam Goodson
	7	Karen Peck
2017	1	Josef D. Klam
	2	Mary Curry Mettenbrink
		Chris Gonzalez
2018	3	Minda Caesar
		Noel Lezama
	4	Chris Vierra
2019	5	David E. Lopez
	-	J. Carter Breed
	6	Pam Goodson
	7	Karen Peck
2020	Election Cancelled	
2021	3	Minda Caesar
	4	Christopher Earnest
		Virginia Elizondo











NOTICE OF SCHOOL TRUSTEE ELECTION SPRING BRANCH INDEPENDENT SCHOOL DISTRICT MAY 1, 2021

A general election shall be held for and within the Spring Branch Independent School District on May 1, 2021, between 7:00 a.m. and 7:00 p.m. The General Election is for the purpose of electing two trustees to the Board for regular three-year terms in Position Nos. 3 and 4. The person elected to each Trustee Position shall be that candidate for each Position who receives the highest number of the votes cast for that Position. On Election Day, May 1, 2021, voters must vote in the precinct in which they are registered to vote. SBISD precincts correspond with middle school attendance zones. Information concerning your voting precinct may be accessed on the District's website at www.springbranchisd.com. The Election on May 1, 2021, will be held jointly with the City of Piney Point Village. The City of Piney Point Village has cancelled their election.

Early Voting

Early voting will begin on April 19, 2021 and continue through April 27, 2021, and will be held at the following locations and times:

Early Voting Locations April 19 – April 27, 2021

Wayne F. Schaper, Sr. Leadership Center	April 19 - April 23	7:00 am - 7:00 pm
955 Campbell Rd Board Room	Saturday, April 24	8:00 am - 12:00 pm
Houston, TX 77024	April 26 – April 27	7:00 am - 7:00 pm
Don Coleman Community Coliseum	April 19 - April 23	7:00 am - 7:00 pm
1050 Dairy Ashford – Home Dressing Room	Saturday, April 24	8:00 am - 12:00 pm
Houston, TX 77079	April 26 – April 27	7:00 am - 7:00 pm
Holy Cross Lutheran Church	April 19 – April 23	7:00 am - 7:00 pm
7901 Westview — Youth Room	Saturday, April 24	8:00 am - 12:00 pm
Houston, TX 77055	April 26 – April 27	7:00 am - 7:00 pm
City of Piney Point Village 7676 Woodway Suite #300 Houston, TX 77063	April 19 – April 23 April 26 – April 27 (no voting at this location on Saturday)	8:00 am – 4:00 pm 7:00 am – 7:00 pm



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Spring Branch ISD 10 Year per Student Cost General Fund

Actual - Mid Year by Fund by Campus/Org

County-District Number: 101920 District Name: SPRING BRANCH ISD Title I Campuses

0	2010 - 2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020		naudited 20-2021
Campus/Org 101920001 - MEMORIAL H S	\$ 5.117.40 \$	4,785.86 \$	5.048.33				5.193.13	5.055.04 \$	5,316.65 \$	5,530.47	\$	5,670.37
101920003 - SPRING WOODS H S	s 6.180.16 \$	5,325.81 \$	5,305.45					5,965,77 \$	6,128,11 \$	6,548,32	\$	7,052.09
	\$ 5,715.27 \$	5,357.61 \$	5,278.65				5 6,281.96 5	6.503.79 \$	6,662.48 \$	8,402.79	\$	8,028.28
	\$ 5,840,32 \$	5.381.87 \$	5,038,94	ŭ 95					5,729.96 \$	5,875.23	\$	5,880.79
101920004 - WESTCHESTER ACADEMY FOR INTERNATIONAL STU		6,118.55 \$	6.573.65						6,644.58 \$	7,061.81	5	7,486.97
	s - s	- S	108,160,00						15,675.34 \$	17,670.94	\$	
	s - s	- s	2			10,171.10	\$ 10,818.55	10,368.89 \$	9,767.48 \$	9,515.74	\$	10,761.91
10 10 200 10 OF TABLE DAY WEST PROPERTY OF THE	\$ 6,951,10 \$	5,924.51 \$	5,495,11	\$ 6.083.53 \$	6,331,27 \$	6,778,48	6,763.71	6,900.19 \$	6,938.34 \$	7,609.98	\$	8,388.48
10.0223 ()	s 4,916.38 s	4,329.47 \$	4,490.50		4,549.93 \$	4,605.73	\$ 4,724.51	4,920.87 \$	5,172.58 \$	5,255.09	\$	5,462.39
	\$ 5,330,31 \$	4,600,90 \$	5,014,66	\$ 4,963,52 \$	5,045.44 S	5,222.80	5 5,452.68	5,321.79 \$	5,569.07 \$	5,431.02	\$	5,709.38
	s 6.337.24 S	5,758.85 \$	5,458.48	\$ 5,295.10 \$	6,056.34 \$	5,401.74	\$ 5,688.42	6,458.84 S	6,559.59 \$	6,748.32	\$	7,012.84
	s 6,125,01 \$	5,508.49 \$	5,398.67	s 5,919.96 \$	5,807.17 \$	5,968,53	6,157.76	5 5,768.82 \$	6,086.98 \$	6,129.99	\$	6,504.75
	\$ 6,829.24 \$	5,789.21 \$	5,919.54	\$ 5,719.77 \$	6,261.41 \$	6,318.65	\$ 6,609.80	5 6,848.89 \$	6,952.38 \$	7,486.86	\$	8,094.74
	s 7,228.27 \$	6,185,27 \$	6,287,26	\$ 6,836.48 \$	6,886.36 \$	8,206,83	\$ 7,384.76	\$ 7,507.45 \$	7,356.67 \$	8,310.07	\$	8,868.37
	\$ 5,326.01 \$	5,149.38 \$	5,104.23	\$ 5,435.31 \$	5,749.28 \$	5,636.44	\$ 5,640.49	5,819.27	6,349.14 \$	6,408.09	\$	6,901.63
	s 24,977,10 s	38,481,80 \$	34,140,38	\$ 39,003.69 \$	36,035.77 \$	31,005.47	\$ 38,188.41	\$ 36,236.35 \$	35,503.68 \$	38,842,39	\$	57,491.85
	\$ 5,415.55 \$	4,169.22 \$	4,323.94	\$ 4,468.95 \$	4,774.21 \$	4,799.22	5,121.13	5,233.51 \$	5,414.06 \$	5,779.69	\$	5,484.27
	s 5,328.98 \$	4,583.34 \$	5,378.57	\$ 5,806.63 \$	5,951,96 \$	6,416,70	\$ 6,160.05	6,076.58	5,773.12 \$	6,193.81	\$	6,912.96
	s 4,749.16 S	4,224.94 \$	4,467.58	\$ 4,717.86 \$	4,831.07 \$	5,052.61	\$ 5,098.20	5,138.47 \$	5,278.88 \$	5,252.28	\$	5,948.20
- Partie Brown Control of the Contro	\$ 5,326,46 \$	4,614.28 \$	5,179.66	\$ 5,026.71 \$	5,018.74 \$	5,352.23	5,628.81	\$ 5,539.92 \$	5,460.29 \$	5,560,95	\$	6,427.81
	\$ 6,220.93 \$	5,421.89 \$	5,279.68	\$ 5,917.82 \$	6,233.76 \$	6,454.20	\$ 6,127.60	\$ 6,508.23 \$	6,346.11 \$	7,054.17	\$	8,814.75
	\$ 5,271.82 \$	4,513.90 \$	4,703.69	\$ 4,766.66 \$	4,654,06 \$	4,835,48	\$ 5,005,50	\$ 4,991.59 \$	5,319.03 \$	5,708.55	S	6,238.67
	\$ 6,438.52 \$	5,959.98 \$	5,670.29	\$ 5,786.39 \$	5,878.04 \$	6,029.93	\$ 6,228.65	\$ 5,975.32 \$	6,484.88 \$	6,461.56	\$	6,405.36
101920109 - MEMORIAL DRIVE EL	\$ 5,814.89 \$	5,296.94 \$	5,731.98	\$ 5,565.76 \$	5,787.36 \$	6,343,13	5 5,973.32	\$ 5,843.30 \$	6,055.08 \$	6,428.81	\$	6,662.64
	\$ 4,958.22 \$	4,894.84 \$	5,327.62	\$ 5,407.00 \$	5,150.41 \$	5,704.29	\$ 6,008.44	\$ 5,676.32 \$	5,837.44 \$			6,334.63
101920111 - RIDGECREST EL	s 5,099.80 S	4,768.72 \$	4,944.84	\$ 4,887.75 \$	5,350.81 \$	5,568.51	\$ 5,644.81	\$ 5,885.39 \$	5,888.62 \$	6,106.46	\$	6,853.24
101920112 - RUMMEL CREEK EL	\$ 5,222.31 \$	4,892.04 \$	5,155.41	\$ 5,378.66 \$	5,532.26 \$	5,564.50	\$ 5,474.76	\$ 5,362.85 \$	5,484.07 \$	6,071.39	\$	5,847.54
101920113 - SHADOW OAKS EL	\$ 5,403.71 \$	5,265.50 \$	5,539,05	\$ 5,311.74 \$	5,592,00 \$	5,792.25	\$ 5,594.62	s 6,017.96 s	6,163.65 \$	6,666,33	\$	7,541.82
101920114 - SPRING BRANCH EL	\$ 5,869.86 \$	4,923.51 \$	5,179.25	\$ 5,332.77 \$	5,513.45 \$	5,844.53	\$ 5,829.41	\$ 6,184.99 \$		6,394.26		8,270.06
101920115 - VALLEY OAKS EL	\$ 5,188.79 \$	4,955,41 \$	5,329.11	\$ 6,023.23 \$	6,214.55 \$	6,176.98	\$ 5,551.05	\$ 5,276.20 \$	Name and Address of the Owner, which was not been sent to	The second secon		6,394.14
101920116 - WESTWOOD EL	\$ 5,460.35 \$	5,763.93 \$	5,322.87	\$ 5,235.88 \$	5,543.51 \$	5,822.45	\$ 6,093.42	\$ 6,349.09 \$				7,597.88
101920117 - WOODVIEW EL	\$ 5,983.36 \$	5,228,05 \$	5,175.88	\$ 5,249.32 \$	5,377,52 \$			The second secon	All the second s			7,953.90
101920118 - WILCHESTER EL	\$ 4,997.25 \$	4,608.66 \$	4,872.05	\$ 4,923.51 \$								5,577.96
101920119 - SHERWOOD EL	\$ 5,687.55 \$	6,002.22 \$	5,777.37	\$ 5,753.84 \$								7,499.74
101920120 - SPRING SHADOWS EL	\$ 5,461.98 \$	5,328.22 \$	4,843.09									7,027,48
101920121 - NOTTINGHAM EL	\$ 5,280.07 \$	4,928.79 \$	4,428.56									6,420.66
101920122 - TERRACE EL	\$ 6,145.47 \$	5,835.26 \$	5,995.45	\$ 6,380.95 \$								8,329.92
101920123 - THORNWOOD EL	\$ 6,222.88 \$	5,138.93 \$	5,317.16	\$ 5,357.61 \$								7,637.44
101920124 - CEDAR BROOK EL	\$ 4,333.30 \$	5,453,05 \$	5,027.32	\$ 5,071.11 \$	5,367.57							7,441.96
101920125 - TREASURE FOREST EL	\$ 5,290.56 \$	4,762.24 \$	4,660.90									7,982.76
101920126 - BUFFALO CREEK EL	\$ 5,907.90 \$		5,711.69									8,314.78
101920128 - THE WILDCAT WAY SCHOOL	\$ 3,143.24 \$		5,015.83									8,574.20
101920129 - THE PANDA PATH SCHOOL	\$ 1,514.03 \$		6,581.44									9,775.55
101920130 - THE LION LANE SCHOOL	\$ 508.28 \$		4,119.45									7,662.56 7,301.43
101920131 - THE BEAR BLVD SCHOOL	\$ 694.71 \$	ALTERNATION SELECTION AND ADMINISTRA	4,405.92						CONTRACTOR AND ADDRESS OF THE PARTY OF THE P			
101920132 - THE TIGER TRAIL SCHOOL	\$ 438.25 \$	4,706.33 \$	5,110.42	\$ 4,351.85 \$	5,010.61	5,550.30	\$ 5,486.96	\$ 4,986.27	\$ 4,850.53 \$	4,997.11	\$	6,737.51

